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             UNITED STATES DISTRICT COURT
           FOR THE NORTHERN DISTRICT OF OHIO
2.
                   EASTERN DIVISION
3
     IN RE: NATIONAL
     PRESCRIPTION
                                MDL No. 2804
     OPIATE LITIGATION
5
                              ) Case No.
                                 1:17-MD-2804
6
     THIS DOCUMENT RELATES
                            ) Hon. Dan A.
     TO ALL CASES
                             ) Polster
8
                FRIDAY, JANUARY 4, 2019
9
      HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
10
                CONFIDENTIALITY REVIEW
11
12
               Videotaped deposition of Ramona
13
    Sullins, held at the offices of JONES DAY, 77
    West Wacker Drive, Chicago, Illinois,
14
    commencing at 7:31 a.m., on the above date,
15
    before Carrie A. Campbell, Registered
16
    Diplomate Reporter, Certified Realtime
17
    Reporter, Illinois, California & Texas
18
19
    Certified Shorthand Reporter, Missouri &
20
    Kansas Certified Court Reporter.
2.1
              GOLKOW LITIGATION SERVICES
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          877.370.3377 ph | 917.591.5672 fax
                    deps@golkow.com
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Page 2  APPEARANCES:	<sup>1</sup> INDEX
	PAGE 3 APPEARANCES
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6	Walmart E-mail(s) 000016232 - Sullins 12 WMT MDL 000016232 - WMT_MDL_000016234
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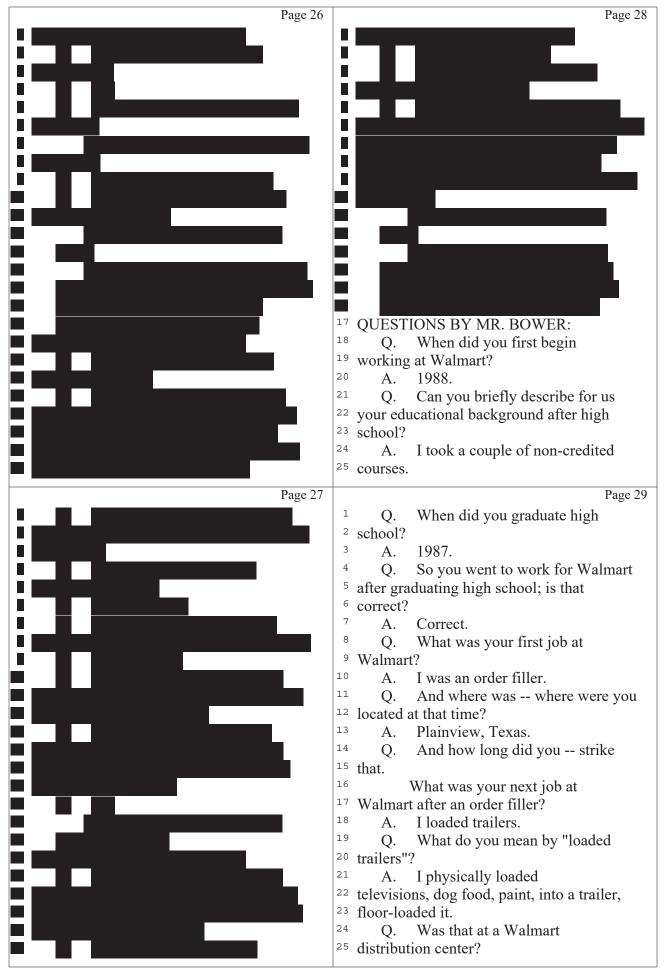
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	Page 6		Page 8
1	Walmart E-mail(s),	1	MR. MORRIS: Paul Morris from
	Sullins 22 WMT_MDL_000017434 -	2	Walmart legal department.
2	WMT_MDL_000017435	3	MS. CACERES: Joanne Caceres
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4	Sullins 23 WMT_MDL_000002717	5	MS. FUMERTON: Tara Fumerton
-	Walmart E-mail(s),	6	from Jones Day on behalf of Walmart
5	Sullins 24 WMT MDL 000007345	7	and the witness.
6	(Exhibits attached to the deposition.)	8	VIDEOGRAPHER: The folks on the
7	(————)	9	phone?
8		10	MR. BUSHUR: Joseph Bushur of
9		11	Williams & Connolly on behalf of
10		12	Cardinal Health.
11		13	MS. NOWAK: Darlene Nowak,
12 13		14	Marcus & Shapira, on behalf of HBC
14		15	Services.
15		16	MR. WIENER: Seth Wiener of
16		17	Arnold & Porter Kay Scholer on behalf
17		18	of Endo Health Solutions, Inc., Endo
18		19	Pharmaceuticals, Inc., Par
19		20	Pharmaceutical, Inc., and Par
20		21	Pharmaceutical Companies, Inc.
21		22	VIDEOGRAPHER: The court
22 23		23	reporter today is Carrie Campbell.
24		24	Can you please swear in the
25		25	witness?
	D 7	_	
1	Page 7	1	Page 9
2	VIDEOGRAPHER: We are now on	1	RAMONA SULLINS,
3	the record.	3	of lawful age, having been first duly sworn
J	My name is Stephan Hoog. I'm		
1	•	1	to tell the truth, the whole truth the
4	the videographer for Golkow Litigation	4	nothing but the truth, deposes and says on
5	the videographer for Golkow Litigation Services.	4 5	nothing but the truth, deposes and says on
5 6	the videographer for Golkow Litigation Services.  The date today is January 4,	4 5 6	nothing but the truth, deposes and says on behalf of the Plaintiffs, as follows:
5 6 7	the videographer for Golkow Litigation Services.  The date today is January 4, 2019. The time is 7:31 a.m., as	4 5 6 7	nothing but the truth, deposes and says on behalf of the Plaintiffs, as follows:
5 6 7 8	the videographer for Golkow Litigation Services.  The date today is January 4, 2019. The time is 7:31 a.m., as indicated on the video screen.	4 5 6 7 8	nothing but the truth, deposes and says on behalf of the Plaintiffs, as follows:  VIDEOGRAPHER: Please proceed.
5 6 7 8 9	the videographer for Golkow Litigation Services.  The date today is January 4, 2019. The time is 7:31 a.m., as indicated on the video screen.  This video deposition is being	4 5 6 7 8	nothing but the truth, deposes and says on behalf of the Plaintiffs, as follows:  VIDEOGRAPHER: Please proceed.  DIRECT EXAMINATION
5 6 7 8 9	the videographer for Golkow Litigation Services.  The date today is January 4, 2019. The time is 7:31 a.m., as indicated on the video screen.  This video deposition is being held in Chicago, Illinois, in the	4 5 6 7 8 9	nothing but the truth, deposes and says on behalf of the Plaintiffs, as follows:  VIDEOGRAPHER: Please proceed.  DIRECT EXAMINATION QUESTIONS BY MR. BOWER:
5 6 7 8 9 10	the videographer for Golkow Litigation Services.  The date today is January 4, 2019. The time is 7:31 a.m., as indicated on the video screen.  This video deposition is being held in Chicago, Illinois, in the matter of In Re: National Prescription	4 5 6 7 8 9 10	nothing but the truth, deposes and says on behalf of the Plaintiffs, as follows:  VIDEOGRAPHER: Please proceed.  DIRECT EXAMINATION QUESTIONS BY MR. BOWER: Q. Good morning, Ms. Sullins. How
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5 6 7 8 9 10 11 12	the videographer for Golkow Litigation Services.  The date today is January 4, 2019. The time is 7:31 a.m., as indicated on the video screen.  This video deposition is being held in Chicago, Illinois, in the matter of In Re: National Prescription Opiate Litigation for the US District Court, Northern District of Ohio.	4 5 6 7 8 9 10 11 12 13	nothing but the truth, deposes and says on behalf of the Plaintiffs, as follows:  VIDEOGRAPHER: Please proceed.  DIRECT EXAMINATION QUESTIONS BY MR. BOWER: Q. Good morning, Ms. Sullins. How are you today? A. Doing good, thank you.
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	Pres 10	Т	D 12
	Page 10		Page 12
	questions and allow your attorney a chance to	1	A. I met with our counsel.
	object to any question before you answer.	2	Q. Okay. When was the first time
3	Okay?	3	you met with your counser.
4	A. Okay.	4	A. It was back in November when
5	Q. And also, I'd ask that if you	5	the original deposition was scheduled.
6	don't understand any question today, you ask	6	Q. Okay. And when did that
7	me to rephrase the question or let me know	7	meeting take place? Do you recall
8	that you don't understand before answering.	8	approximately strike that.
9	Do you understand that?	9	A. Before before Thanksgiving.
10	A. I do understand that.	10	Q. And your deposition in this
11	Q. Okay. So if you do answer a	11	case was rescheduled, correct?
12	question, I will assume that you did	12	A. Correct.
13	understand the question.	13	Q. Okay. Do you recall
14	Okay?	14	approximately how long before that initial
15	A. Okay.	15	deposition was scheduled you first met with
16	Q. And also, please, if the answer	16	counsel?
17	calls for a yes or no, provide the answer	17	A. The one time I met with counsel
18	verbally without shaking your head or nodding	18	was in November.
19	your head so the court reporter can take down	19	Q. November.
20	your answer.	20	About how many days before the
21	Okay?		initial deposition was scheduled did that
22	A. Okay.		meeting take place?
23	•	23	-
24	Q. Is there any reason that you		A. I don't recall. It might have been a week.
25	cannot testify truthfully today?  A. No.	25	
23	A. No.	23	Q. Okay. And approximately how
	D 11		D 12
	Page 11		Page 13
1	Q. Are you taking any medication	1	long was that meeting?
1 2	Q. Are you taking any medication	1 2	_
	Q. Are you taking any medication that would prevent you from testifying		long was that meeting?
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	ignly confidential - subject to	·	7
	Page 14		Page 16
1	recall.	1	Q. Did you review documents during
2	Q. You believe there was a meeting	2	that meeting?
3	scheduled, but you're not sure?	3	
4	A. That's correct.	4	Q. Did you review documents that
5	Q. Okay. Since that initial	5	refreshed your recollection for the testimony
6	four-hour meeting, have you done anything	6	you will provide today?
7	else to prepare for today's deposition?	7	· · · · · · · · · · · · · · · · · · ·
8	A. Just met with them yesterday.	8	Q. What was the purpose of
9	Q. Okay. And how long was that	9	reviewing documents?
10	meeting?	10	_
11	A. Approximately seven, eight	11	
12	hours.	12	
13		13	
14	<ul><li>Q. And who did you meet with?</li><li>A. Tara.</li></ul>	14	
15		15	counsel, so I il mistraet her not to
16	Q. Anyone else?	16	answer that question unless she can
17	A. Joanne was there. Paul was	17	answer it without revealing
18	there.	18	attorney-enent communications.
19	Q. Anyone else?		QUEDITOTIO DI TITIC. DO VIERC.
	A. I don't know her name. I think	19	Q. Can you answer the question.
20	her name's Tina.	20	11. 110.
21	Q. Do you remember whether they	21	Q. Okay. Have you ever been asked
22	were counter for wannar or outside counter.	22	to provide counser with documents for this
23	A. They were part of Jones Day.	23	case?
24	Q. Jones Day.	24	A. Not that I recall.
25	Was there anyone on the phone?	25	Q. Has anyone asked you whether
		+	
	Page 15		Page 17
1	_	1	
1 2	A. I don't know anybody that		you have documents that might be relevant to
	A. I don't know anybody that chimed in.		you have documents that might be relevant to this case?
2	A. I don't know anybody that chimed in. Q. Was there a phone call open?	2	you have documents that might be relevant to this case?  MS. FUMERTON: Again, I object
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2 3 4	<ul> <li>A. I don't know anybody that chimed in.</li> <li>Q. Was there a phone call open?</li> <li>A. There was.</li> <li>Q. Okay. Do you know who was on,</li> </ul>	3 4	you have documents that might be relevant to this case?  MS. FUMERTON: Again, I object to the question to the extent that you're asking her about questions
2 3 4 5	A. I don't know anybody that chimed in. Q. Was there a phone call open? A. There was. Q. Okay. Do you know who was on, listening in to that phone?	2 3 4 5	you have documents that might be relevant to this case?  MS. FUMERTON: Again, I object to the question to the extent that you're asking her about questions communications with counsel, and I'm
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Page 18 Page 20 1 THE WITNESS: No. 1 To the extent that she's, for 2 QUESTIONS BY MR. BOWER: example, talked to other folks at 3 3 Walmart about whether or not they've Q. Have you ever spoken with anyone at Walmart about this case? 4 4 given deposition testimony, I think 5 5 A. No. that's fair game, but I do not agree 6 6 with you that you can ask her MS. FUMERTON: Again, just give 7 questions about communications with 7 me a second to object. 8 To the extent it's outside of 8 counsel. 9 9 communications with counsel in Just because it's a yes or no 10 10 preparation for the deposition. question does not mean that it does 11 THE WITNESS: No. 11 not invade privilege. 12 12 OUESTIONS BY MR. BOWER: But to the extent you can 13 13 Okay. Are you aware of whether answer the question outside of 14 other Walmart employees have given testimony communications with counsel, please go 15 in this case? ahead. 16 Can you repeat the question? 16 A. THE WITNESS: No. 17 MR. BOWER: Can you just read QUESTIONS BY MR. BOWER: 18 it? Well, I'll ask it more directly. Did counsel tell you who's been 19 (Court Reporter read back 20 question.) deposed in this case? MS. FUMERTON: And again, I'm 21 MS. FUMERTON: Again, I 22 going to object to the question to the 22 instruct you not to answer that 23 23 extent that you're asking about any question on the basis of 24 communications with counsel. 24 attorney-client privilege. 25 25 But to the extent that she has Page 19 Page 21 1 knowledge outside of those 1 QUESTIONS BY MR. BOWER: communications, she can answer the 2 Q. Are you going to follow those 3 question. instructions and not answer the question? 4 THE WITNESS: No. A. I'm going to follow the QUESTIONS BY MR. BOWER: instructions. 6 Q. Is your answer affected by Do you know whether the communications with counsel and your documents you reviewed in preparation for 7 your deposition were produced in this case? counsel's instructions not to answer 9 concerning those communications? MS. FUMERTON: I -- to the 10 MR. BOWER: It's a yes or no 10 extent that you're asking about 11 11 specific documents that she reviewed question. She's allowed to answer 12 12 whether she had knowledge of other with counsel, I think it's 13 13 folks giving testimony. That's not a inappropriate for you to ask her to 14 privileged correspondence. There's no 14 identify those documents. 15 QUESTIONS BY MR. BOWER: 15 legal advice being provided. 16 So I'll ask it again. 16 Q. I'm not asking -- just to be **OUESTIONS BY MR. BOWER:** clear, I'm not asking her to identify 17 18 Q. Are you aware of whether other document. I'm just asking whether you know Walmart employees have provided testimony in the documents that you acknowledge you this case? reviewed were produced to plaintiffs in this 21 MS. FUMERTON: I disagree with case. 22 22 your assertion of the law. I object I have no idea. A. to the question to the extent that it 23 24 would invade communications with 25 counsel.





			_		r confidentiality Review
		Page 30			Page 32
1	A.	Yes.			s or areas of the business you were
2	Q.	Which distribution center was	2	respective.	
3	that?		3	A.	Not not at that time.
4	A.	6012.	4	Q.	Was this at the same DC?
5	Q.	And where is that distribution	5	A.	Yes.
6	center lo		6	Q.	Who did you report to at this
7	A.	Plainview, Texas.	7	time?	
8	Q.	And just briefly can you	8	A.	I don't recall.
9		what you did as an order filler?	9	Q.	And you held that role for
10	A.	I filled orders for the store.	10		mately two years, until approximately
11	Q.	What do you mean by you "filled	11	1//2.	
12		or the store"?	12	A.	Yes.
13		Can you describe that with more	13	Q.	What was your next role at
14	specifici	•	14	vv allilal	
15	Α.	So I filled like makeup, yarn,	15	A.	I was a supervisor.
16	-	aced those in a box and shipped	16	Q.	What did you supervise?
17	tiiciii.	***	17	A.	The associates in the order
18	Q.	Were those online orders?	18	filling a	
19	A.	No.	19	Q.	How long did you hold that
20	Q.	Where were the orders coming	20	role?	
21	from?		21	A.	Until approximately 1995.
22	Α.	The stores that were aligned to	22	Q.	And then what role did you take
23		ribution center.	23	on in 19	
24	Q.	Okay. So you're also the	24	A.	I was a manager trainee.
25	role you	described of filling orders was also	25	Q.	And what does that mean?
		Page 31			Page 33
1	at the dis	Page 31 stribution center; is that correct?	1	A.	
1 2	at the dis	<u> </u>	1 2		I was in the processes of
		stribution center; is that correct?			
2	A. Q.	stribution center; is that correct? That's correct.	2	learning Q.	I was in the processes of how to run a department.  Does Walmart have specific
2	A. Q. next pos	Stribution center; is that correct? That's correct. Okay. And then what was the	2	learning Q. training	I was in the processes of how to run a department.
2 3 4	A. Q. next pos	Stribution center; is that correct? That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance.	2 3 4	learning Q. training	I was in the processes of how to run a department.  Does Walmart have specific for its prospective managers?
2 3 4 5	A. Q. next pos A. Q.	Stribution center; is that correct? That's correct. Okay. And then what was the ition you held at Walmart?	2 3 4 5	learning Q. training A. Q.	I was in the processes of how to run a department. Does Walmart have specific for its prospective managers? It did at that time.
2 3 4 5 6	A. Q. next pos A. Q.	That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what	2 3 4 5 6	learning Q. training A. Q.	I was in the processes of show to run a department.  Does Walmart have specific for its prospective managers?  It did at that time.  And you were chosen to
2 3 4 5 6 7	A. Q. next pos A. Q. time per	Stribution center; is that correct? That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what itod was that?	2 3 4 5 6	learning Q. training A. Q. participa	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct?
2 3 4 5 6 7 8	A. Q. next pos A. Q. time per A.	That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what itod was that? 1990. And where were you located at	2 3 4 5 6 7 8	learning Q. training A. Q. participa A.	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995,
2 3 4 5 6 7 8	A. Q. next pos A. Q. time per A. Q.	That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what itod was that? 1990. And where were you located at	2 3 4 5 6 7 8	learning Q. training A. Q. participa A. Q.	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995,
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2 3 4 5 6 7 8 9 10	A. Q. next pos A. Q. time per A. Q. that time A. Q.	Stribution center; is that correct? That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what iod was that? 1990. And where were you located at e? Plainview, Texas.	2 3 4 5 6 7 8 9 10	learning Q. training A. Q. participa A. Q. approxin A.	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995, mately? Approximately. And where did that training
2 3 4 5 6 7 8 9 10 11	A. Q. next pos A. Q. time per A. Q. that time A. Q. role in q A.	Stribution center; is that correct? That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what iod was that? 1990. And where were you located at e? Plainview, Texas. And how long did you hold that	2 3 4 5 6 7 8 9 10 11 12	learning Q. training A. Q. participa A. Q. approxin A. Q.	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995, mately? Approximately. And where did that training
2 3 4 5 6 7 8 9 10 11 12 13	A. Q. next pos A. Q. time per A. Q. that time A. Q. role in q	That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what itod was that? 1990. And where were you located at et? Plainview, Texas. And how long did you hold that uality assurance?	2 3 4 5 6 7 8 9 10 11 12 13	learning Q. training A. Q. participa A. Q. approxin A. Q. take place	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995, mately? Approximately. And where did that training ce?
2 3 4 5 6 7 8 9 10 11 12 13	A. Q. next pos A. Q. time per A. Q. that time A. Q. role in q A.	That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what itod was that? 1990. And where were you located at e? Plainview, Texas. And how long did you hold that uality assurance? I don't recall how long I held Approximately how long?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	learning Q. training A. Q. participa A. Q. approxin A. Q. take place A.	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995, mately? Approximately. And where did that training ce? Palestine, Texas. And what type of training di?
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2 3 3 4 4 5 6 6 7 8 9 10 11 12 13 14 15 16 17	A. Q. next pos A. Q. time per A. Q. that time A. Q. role in q A. the role. Q. A. Q. what we	Stribution center; is that correct? That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what iod was that? 1990. And where were you located at e? Plainview, Texas. And how long did you hold that uality assurance? I don't recall how long I held Approximately how long? Maybe two years. And just generally speaking, re your duties and responsibilities in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	learning Q. training A. Q. participa A. Q. approxin A. Q. take plac A. Q. occurred A. Q.	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995, mately? Approximately. And where did that training ce? Palestine, Texas. And what type of training di? Leadership training. Anything else? Manpower, forecasting,
2 3 3 4 4 5 6 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. next pos A. Q. time per A. Q. that time A. Q. role in q A. the role. Q. A. Q. what we	Stribution center; is that correct? That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what iod was that? 1990. And where were you located at e? Plainview, Texas. And how long did you hold that uality assurance? I don't recall how long I held Approximately how long? Maybe two years. And just generally speaking, re your duties and responsibilities in assurance?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	learning Q. training A. Q. participa A. Q. approxin A. Q. take plac A. Q. occurred A. Q.	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995, mately? Approximately. And where did that training ce? Palestine, Texas. And what type of training di? Leadership training. Anything else? Manpower, forecasting,
2 3 3 4 4 5 6 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Q. next pos A. Q. time per A. Q. that time A. Q. role in q A. the role. Q. A. Q. what we quality a A.	Stribution center; is that correct? That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what iod was that? 1990. And where were you located at e? Plainview, Texas. And how long did you hold that uality assurance? I don't recall how long I held Approximately how long? Maybe two years. And just generally speaking, re your duties and responsibilities in issurance? Inventory control, cycling the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	learning Q. training A. Q. participa A. Q. approxin A. Q. take plac A. Q. occurred A. Q. administ Q.	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995, mately? Approximately. And where did that training ce? Palestine, Texas. And what type of training d? Leadership training. Anything else? Manpower, forecasting, trative. What do you mean when you
2 3 3 4 4 5 6 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. next pos A. Q. time per A. Q. that time A. Q. role in q A. the role. Q. A. Q. what we quality a A. inventor	Stribution center; is that correct? That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what iod was that? 1990. And where were you located at e? Plainview, Texas. And how long did you hold that uality assurance? I don't recall how long I held Approximately how long? Maybe two years. And just generally speaking, re your duties and responsibilities in assurance? Inventory control, cycling the y, problem solving with freight that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	learning Q. training A. Q. participa A. Q. approxin A. Q. take plac A. Q. occurred A. Q. adminis Q. say st	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995, mately? Approximately. And where did that training ce? Palestine, Texas. And what type of training di? Leadership training. Anything else? Manpower, forecasting, trative. What do you mean when you rike that.
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2 3 3 4 4 5 6 6 7 8 9 100 111 122 133 144 155 166 177 188 199 200 211 222 23 24	A. Q. next pos A. Q. time per A. Q. that time A. Q. role in q A. the role. Q. A. Q. what we quality a A. inventor	Stribution center; is that correct? That's correct. Okay. And then what was the ition you held at Walmart? I went into quality assurance. Okay. And approximately what iod was that? 1990. And where were you located at st? Plainview, Texas. And how long did you hold that uality assurance? I don't recall how long I held Approximately how long? Maybe two years. And just generally speaking, re your duties and responsibilities in assurance? Inventory control, cycling the y, problem solving with freight that we a home. Mostly just inventory	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	learning Q. training A. Q. participa A. Q. approxin A. Q. take plac A. Q. occurred A. Q. adminis Q. say st	I was in the processes of show to run a department. Does Walmart have specific for its prospective managers? It did at that time. And you were chosen to ate in that training, correct? Correct. That was in 1995, mately? Approximately. And where did that training ce? Palestine, Texas. And what type of training d? Leadership training. Anything else? Manpower, forecasting, trative. What do you mean when you rike that. Can you describe what tip training is?
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Page 34 <sup>1</sup> do you handle, you know, your interviewing 1 So until approximately 1996 at <sup>2</sup> skills; how do you, you know, write different some point you switched again? <sup>3</sup> disciplinary things. I'm trying to think Yes. Α. <sup>4</sup> what else was in there. 4 O. Okay. What was your next role? I was a QA manager. QA, And I realize this is going 6 back a ways. I'm just trying to get a quality assurance. general sense of what you were --Can you just describe for us O. That was -very briefly what that means? A. 9 O. That's fine. So it's the inventory, so on the -- you would have responsibility for all 10 And then do you have any recollection with respect to what kind of the the inventory and the associates that 12 other areas were, the manpower, forecasting, reported up through that process. administrative, what just generally those How long did you have that 13 involved? role, approximately? 15 A. Just knowing how to read the --A. Maybe about six or seven <sup>16</sup> the associates' attendance, how to forecast, months. <sup>17</sup> you know, based on the volume coming in, how O. And then you switched again; is many people do you need, how long is it going 18 that correct? 19 to take to do the work. That was the 19 I moved. Α. manpower forecasting. 20 O. Oh, you moved where you lived; 21 And how long did the training 21 is that --Q. 22 last? 22 A. Yes. 23 I believe it was -- I want to 23 O. And where did you move? <sup>24</sup> say six weeks. I don't recall how long the To Loveland, Colorado. A. Did you continue to work for 25 training was. O. Page 35 Page 37 <sup>1</sup> Walmart in Loveland, Colorado? O. Okay. And then after you received this training, did you take a A. different position at Walmart? 3 Q. Okay. What did you do there? A. Then I had an area to run. A. I'm sorry? What did you do in Loveland? 5 Okay. And what area was that? Q. O. 6 The marking room. 6 A. I'm sorry. 7 Can you describe what the Q. A. So I was an area manager as marking room is? 8 well. 9 So it was when goods came in to And how long did you have that Walmart, they weren't ticketed, so we would role in Loveland, approximately? 10 10 11 ticket those -- that merchandise, and the I lived in -- so I got there in 11 A. May of '96, and I left in April of '97. majority of it was apparel and shoes. And what do you mean by You left Loveland in April O. Q. 14 "ticketed"? of '97; is that correct? 15 15 Α. Showed the price tags on them. A. That's correct. 16 16 Was this position also at the Q. Q. Okay. And where did you go at 17 DC? 17 that point? 18 18 I went to Hope Mills, North A. Yes. Α. 19 And these were products that 19 Carolina. O. were sold to Walmart by manufacturers or 20 O. Was that move a result of a 21 suppliers? 21 change in Walmart jobs? 22 Yes. 22 A. No. It was distribution as A. 23 23 Q. And how long did you have that well.

24

O.

Maybe a year.

24

25

role?

Α.

Okay. That move was for

<sup>25</sup> personal reasons not related to your

Page 38 <sup>1</sup> employment at Walmart; is that correct?

- That's correct.
- 3 So now you're in North O.
- Carolina, still working for Walmart on the

distribution side, correct?

- Correct. A.
- O. Was that also a distribution
- center in North Carolina?
- 9 Yes.

2

6

7

- 10 Q. And are you still a manager, an 11 area manager, there?
- 12 Α. Yes.
- 13 Okay. And what was the next Q. 14 role you had at Walmart?
- 15 So then I transferred back to Plainview, Texas, in October of '97, and I 17 had an area manager position there as well.
- 18 And then how long did you hold 19 that position back in Texas?
- 20 A. Until 2004.
- 21 And what change occurred in Q.
- 22 2004?

9

10

22

- 23 I moved to Bentonville, A.
- Arkansas.
- 25 O. And then what position did

I worked with -- I was a

<sup>2</sup> liaison between merchandising and logistics.

Page 40

Page 41

- And what sort of things would
- you do on a day-to-day basis?
- I would meet with the buyers to
- <sup>6</sup> find out when they were flowing product into
- the distribution centers and determine when
- those were going to hit. Because with
- apparel it's seasonal, so there was four
- seasons that you had to flow through; so you
- have, you know, the winter season, you -- it
- <sup>12</sup> was a certain specific time frame. If there
- was inventory left in the distribution
- center, that you partnered with them to try
- to flow that into the stores.
- During this time period, was there a database or any other electronic
- system that Walmart used to manage its 19 inventory?
- 20 MS. FUMERTON: Objection.
- 21 Form.

position?

A.

Till 2008.

24

25

24

1

- 22 QUESTIONS BY MR. BOWER:
- 23 I'll strike that.
  - How did Walmart manage its

MS. FUMERTON: Objection.

inventory in 2004?

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you -- strike that.

2 Did you change positions at <sup>3</sup> that point?

- A. I did.
- 5 Q. Okay. And what was your new 6 position?
- 7 I worked in merchandise 8 support.
  - Q. Is that at a DC in Bentonville?
  - No, that was in the home
- office. That was in the logistics building.
- 12 And can you just describe generally what your duties and
- responsibilities were for that role in
- merchandise support? 15 16
- So I had responsibility for all of the apparel and shoes and the flow of
- 19
  - And is that for all of the
- 21 Walmarts in the world?
- So you were responsible for 23
- 25 correct?

those -- that product from supplier to distribution center.

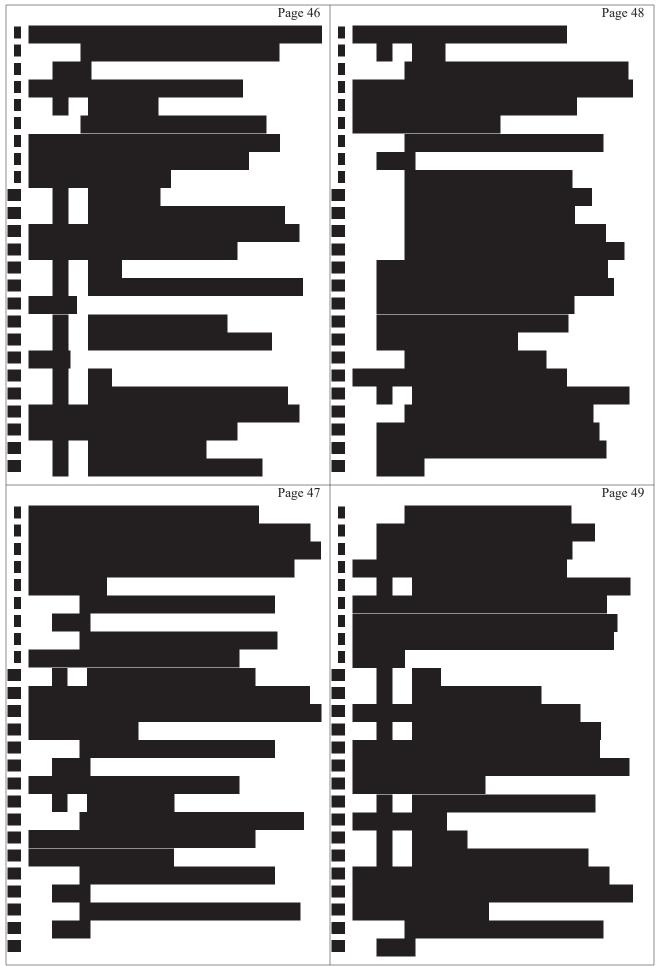
In all the US apparel DCs.

getting the apparel to the DCs; is that

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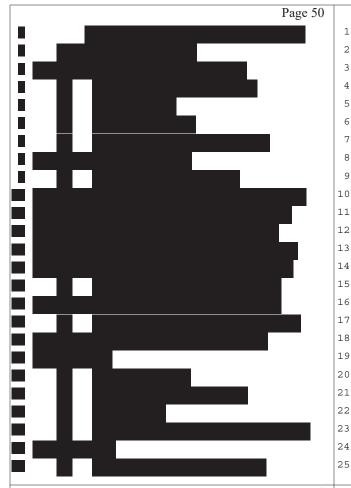
2 Form. 12 Q. Did you receive at that point any -- or strike that. At any point did you receive specific training with respect to merchandise 16 inventory management? 17 A. I did. 18 Q. Okay. When was that? 19 When I came in 2004. A. 20 O. Did that training occur in 21 Bentonville? 22 Yes. A. 23 Q. And how long did you hold that





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<sup>1</sup> would monitor orders?

MS. FUMERTON: Objection.

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Page 53

3 Form.

2

**QUESTIONS BY MR. BOWER:** 

And I'm just trying -- just so <sup>6</sup> the record is clear, I'm just trying to understand your answer.

You said "the distribution center did and the associates did." Are those two different things in your mind?

- They're all at the distribution center.
- And what were the associates Q. doing prior to the rollout of Reddwerks?
- So my understanding is that they would -- they would let their manager know if they saw an order that was out of the ordinary.
  - O. What do you mean by "out of the ordinary"?
- A. Like, for example, ReliOn 22 insulin, we had orders that would -- where the pharmacy would think that they were <sup>24</sup> ordering ten vials of insulin, and they <sup>25</sup> actually ordered a hundred of them because

Page 51



And you believe that occurred 7 sometime in 2010; is that correct?

- '10 or '11. I don't recall.
- Before that rollout occurred,
- did Walmart have a monitoring program in 11 place? 12
  - A. Yes.

8

13

- And what was that program? O.
- 14 A. I believe it was a 405 report,
- 15 and they monitored orders as they came in.
- 16 Okay. And what do you mean by -- when you say "they monitored orders as they came in," what does that mean?
- 19 So the distribution center did and the associates did.
- 21 Are the associates at the O. 22 distribution center?
- 23 A. Yes.
- 24 Okay. Anyone other than the O. associates at the distribution center that

<sup>1</sup> they were in packs of ten. So those would be <sup>2</sup> examples of what they would bring to their attention.

O. And in fact, Walmart had an automatic cut for those instant orders, correct?

MS. FUMERTON: Objection.

Form.

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18

19

Go ahead.

THE WITNESS: For the what now? **QUESTIONS BY MR. BOWER:** 

For those insulin orders that you just -- the example that you just provided, Walmart actually had an automatic cut for those orders, didn't they?

MS. FUMERTON: Objection. Form.

THE WITNESS: It was a manual cut; it wasn't automatic.

**QUESTIONS BY MR. BOWER:** 

21 A manual cut that was automatically applied to insulin orders, 23 correct?

24 MS. FUMERTON: Objection. 25 Form.

Page 54 Page 56 1 THE WITNESS: They would call Well, first they would print 2 the store to inform them that they had <sup>2</sup> the 222 form, sign those, and then that and 3 <sup>3</sup> the paper order would be put together in a placed -- if they really wanted a 4 hundred because, I mean, the packet, and the associates would fill orders 5 refrigerator didn't hold a hundred. <sup>5</sup> based on that paper order. 6 QUESTIONS BY MR. BOWER: And was it the practice for the 7 Right. orders to be filled and shipped the same day And that was specific to they came in? 9 insulin, correct? A. Yes. 10 10 Α. That's correct. Q. And approximately how many 11 Okay. What about with respect orders came in to DC 6045 on a daily basis Q. 12 to Schedule II narcotics, what were the DCs during this time period? doing in 2008? 13 I don't recall how many orders 14 MS. FUMERTON: Objection. 14 came in. 15 15 O. Would it have been in the Form. <sup>16</sup> hundreds of orders? Could it have been in THE WITNESS: My understanding 17 is they would do the same thing with the hundreds of orders per day? 18 Well, they filled store 19 QUESTIONS BY MR. BOWER: order -- store only got an order once a week 20 And where does that of C-IIs. So if you divide it up, however 21 understanding come from? many stores we had at the time, that's how 22 Just from when I was training 22 many orders they would -- processed, four in 2008, when I was out at the DCs training. days a week. Q. Okay. So what specifically did 24 Q. That's fine. 25 <sup>25</sup> you learn in connection with your training You said four days a week? Page 55 Page 57 <sup>1</sup> that the DCs were doing for Schedule II A. Yes. narcotics? O. So, for example, if there were 3 MS. FUMERTON: Objection. 4,000 stores, approximately a thousand orders a day, correct? Form. 5 THE WITNESS: So again, they A. Potentially. 6 would look at that paper and let their And just so the record's clear, 7 supervisor or manager know that this you mentioned a couple reports. I just want 8 appears to be out of the ordinary or to go through just what those reports are. 9 9 unusual. What is a 222? 10 QUESTIONS BY MR. BOWER: 10 It's a DEA 222 form to move A. 11 And at that point -- and we're C-II drugs. talking 2008, correct? 12 Q. Okay. And what is a 405 13 Yes. A. report? 14 At that point, how was DC 6045 A. So it was a report that the receiving orders? They were paper, correct? 15 distribution used. I don't know what they --16 So those would come in I don't know what all it had on there. I 17 electronically. They're printed on paper. 17 know that they used it. 18 18 They would come in And how do you know that they Q. 19 electronically once a day? 19 used it? 20 20 A. That's correct. Because when it didn't generate 21 21 Q. And then they would print it on one month, they pinged me to help them get it paper at the DC? 22 22 generated. 23 23 That's correct. Do you know why they pinged you A.

24

25

A.

to help get them generated?

Because of the systems

And then what would happen to

24

Q.

those papers?

Page 58 Page 60 <sup>1</sup> background that I had. <sup>1</sup> basis? 2 And what systems backgrounds do That was part of the training A. <sup>3</sup> that -- when I was learning how to -- they you have? It was mainly knowing how the <sup>4</sup> filled orders. They told me and so did the <sup>5</sup> orders would come in, some of the jobs that associates. <sup>6</sup> were run for certain reports. So I would Q. Okay. So who told you that? <sup>7</sup> partner with maybe my -- I had contacts over A. I don't recall the manager that would have said it. 8 in the IT department, so they would ask me to ping somebody over in IT to let them know Was it the manager at 6045 or that a report didn't run. your manager for the training? 11 And I just want to put a time 11 No, it was the managers that <sup>12</sup> frame on that answer. were supervisors at 6045. 13 What time frame would you ping 13 Mike Mullin? folks in IT to run a report? 14 He was a general manager. I A. 15 MS. FUMERTON: Objection. don't know. 16 16 Okay. Do you know who had Form. O. 17 THE WITNESS: That happened to responsibility at 6045 for making sure the 18 be one incident. I don't know when it associates would review the orders for 19 Schedule II narcotics? occurred. 20 20 **QUESTIONS BY MR. BOWER:** Α. I don't know. 21 21 Are you aware of any instance Okay. Other than the 405 O. <sup>22</sup> reports and the DC associates reviewing the <sup>22</sup> where the associates flagged an order for <sup>23</sup> orders, prior to the role of Reddwerks, was Schedule II narcotics as potentially <sup>24</sup> Walmart doing anything else to review orders suspicious? <sup>25</sup> for Schedule II narcotics? MS. FUMERTON: Objection. Page 59 Page 61 1 MS. FUMERTON: Objection. Form. 2 2 Form. THE WITNESS: I don't know. 3 THE WITNESS: I don't know. QUESTIONS BY MR. BOWER: QUESTIONS BY MR. BOWER: O. Was that part of your training? 5 Anything else that you're aware I spent a day there. I --A. of that was being done? doing the order filling process. That day we 7 didn't. I don't know of anything else that MS. FUMERTON: Objection. 8 would have been done. Form. 9 9 What about since that day? THE WITNESS: I don't know. 1.0 10 QUESTIONS BY MR. BOWER: MS. FUMERTON: Objection. 11 11 Well, you visited DC 6045 in O. Form. 2008, correct? 12 THE WITNESS: I don't know. It 13 13 A. I did. wouldn't have been anything that would Okay. At that point did you 14 have come to me. see anything else being done in connection with reviewing orders placed by the 17 pharmacies for Schedule II narcotics? 18 MS. FUMERTON: Objection. 19 Form.

6045 tell you that they would have the

**QUESTIONS BY MR. BOWER:** 

THE WITNESS: Not that I

Okay. And did someone at DC

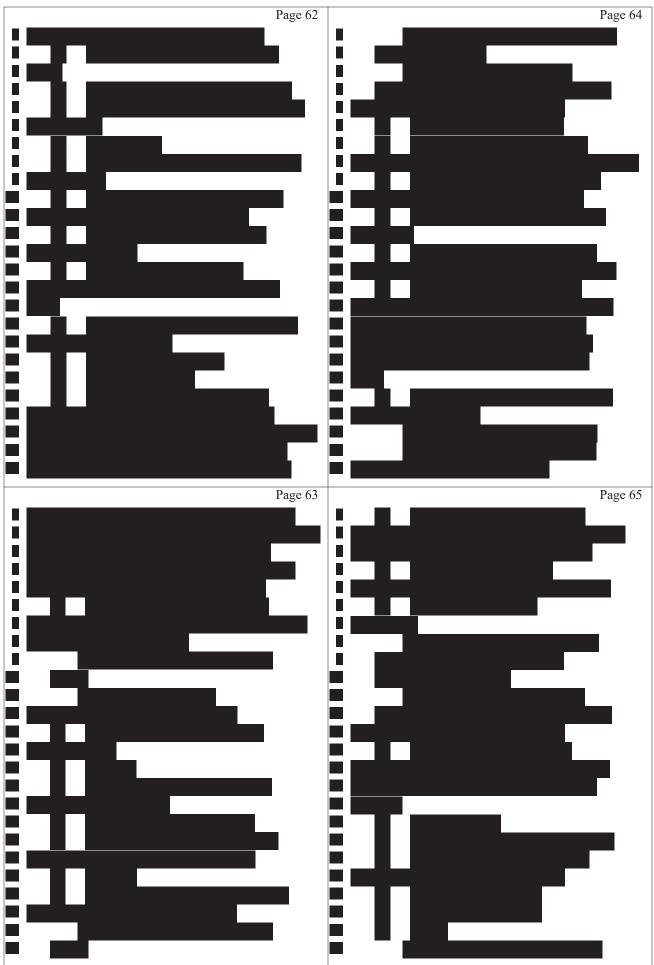
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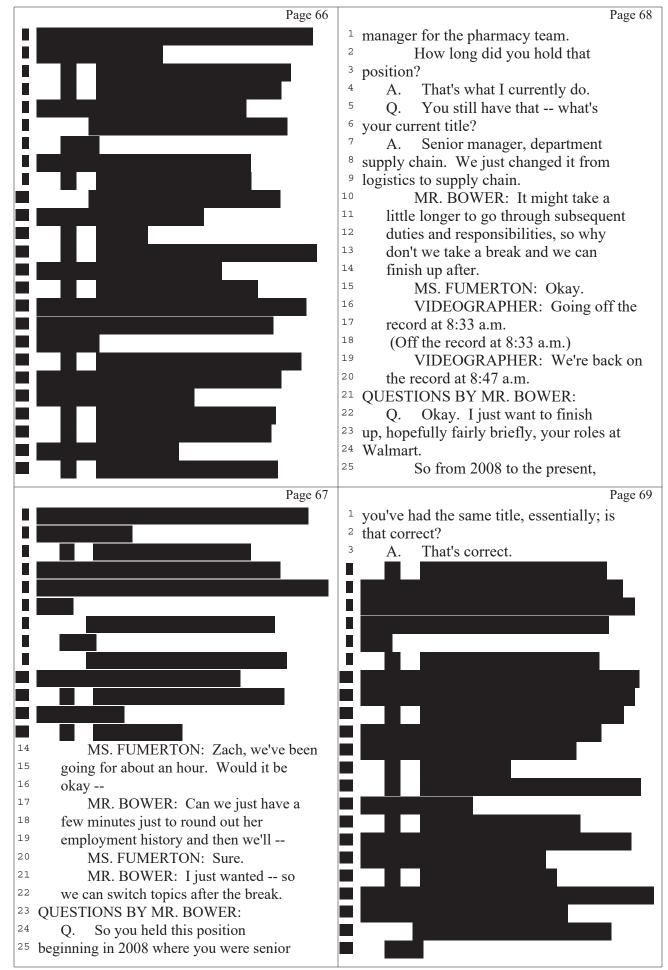
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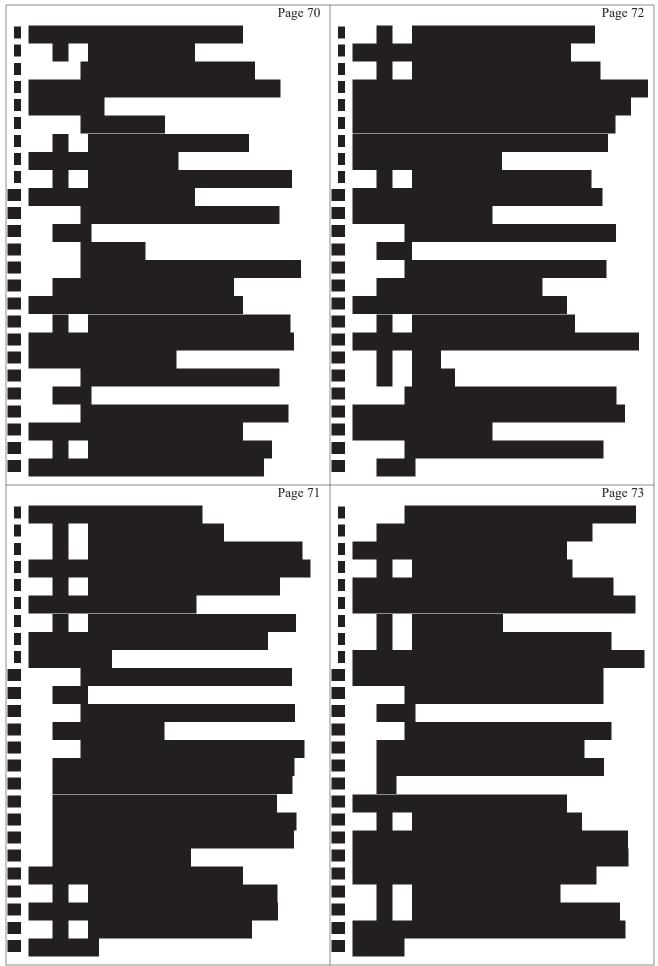
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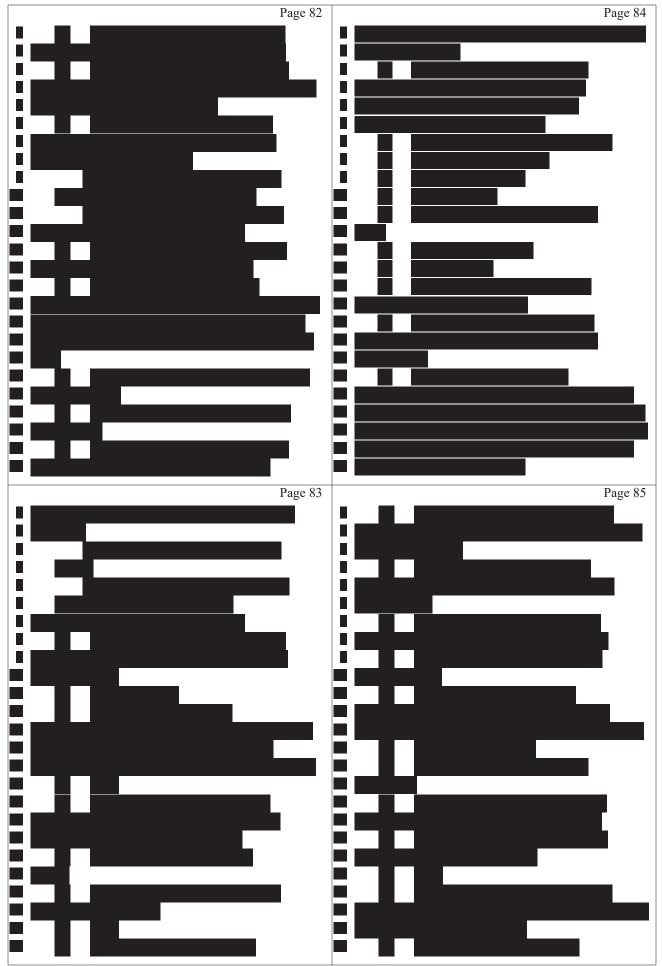
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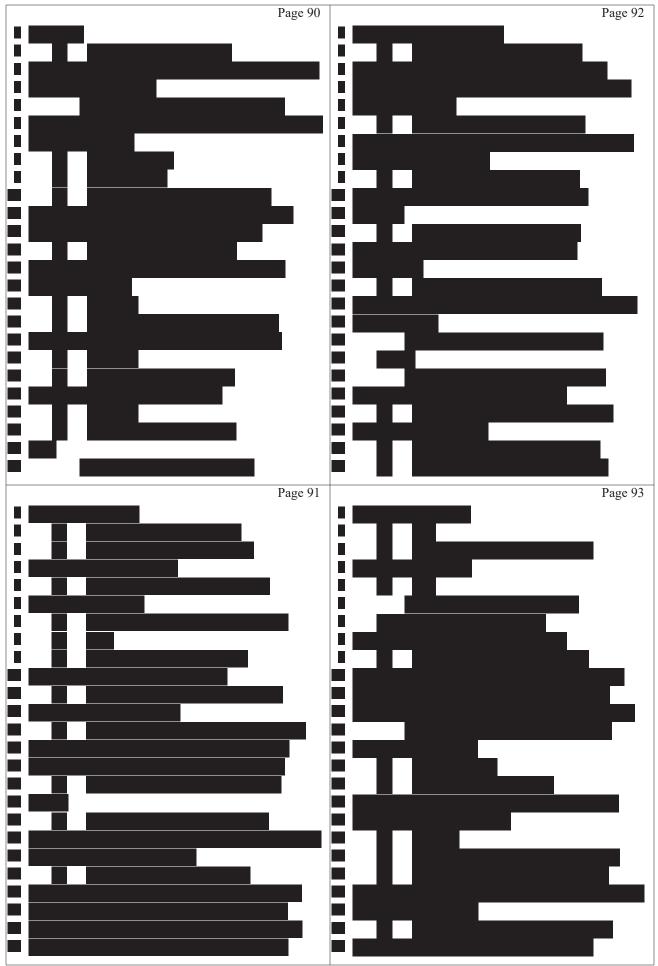




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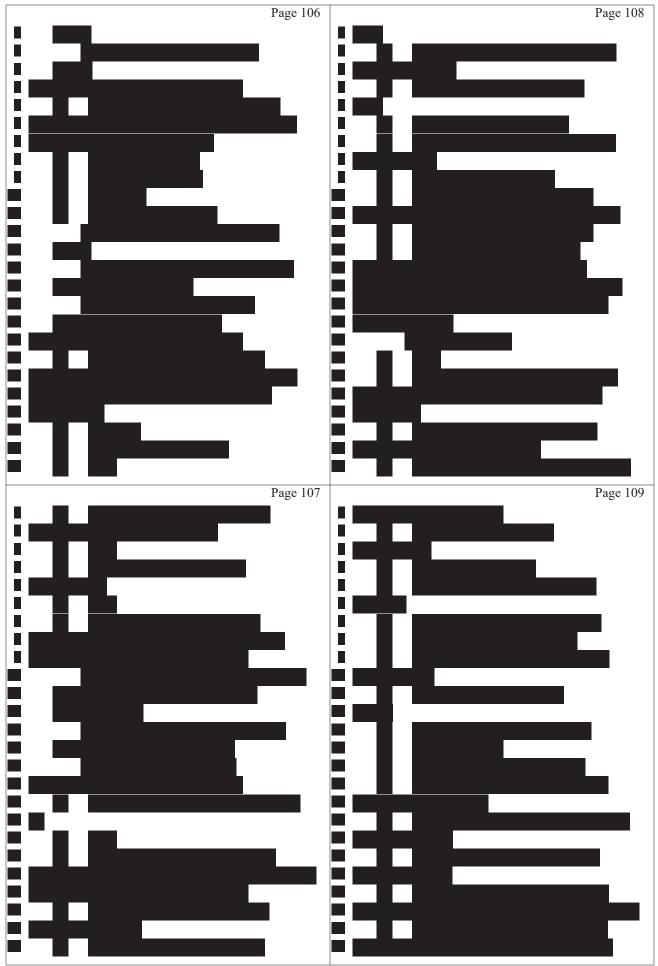






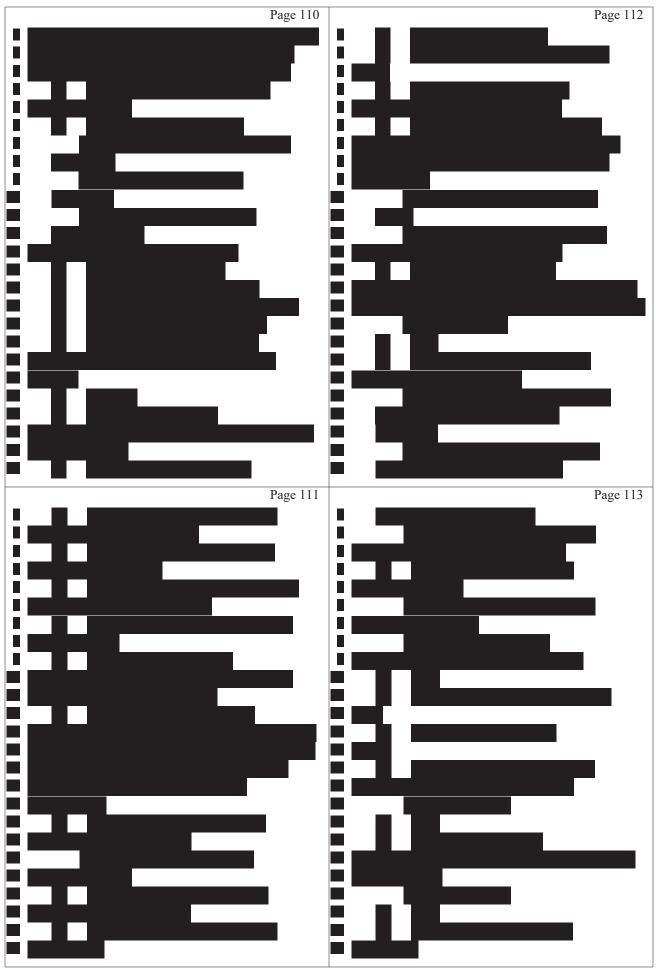


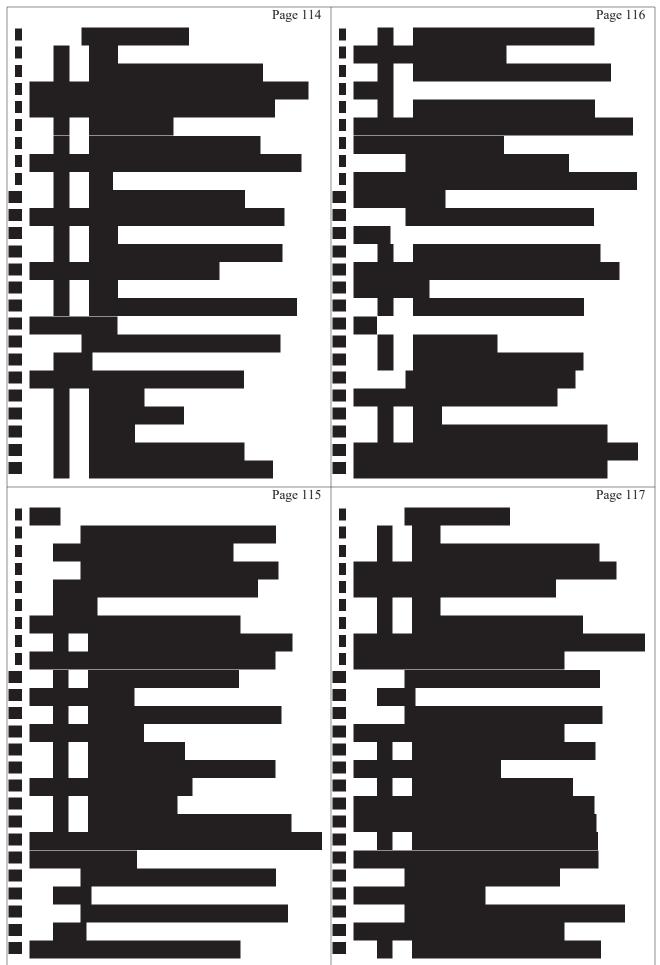




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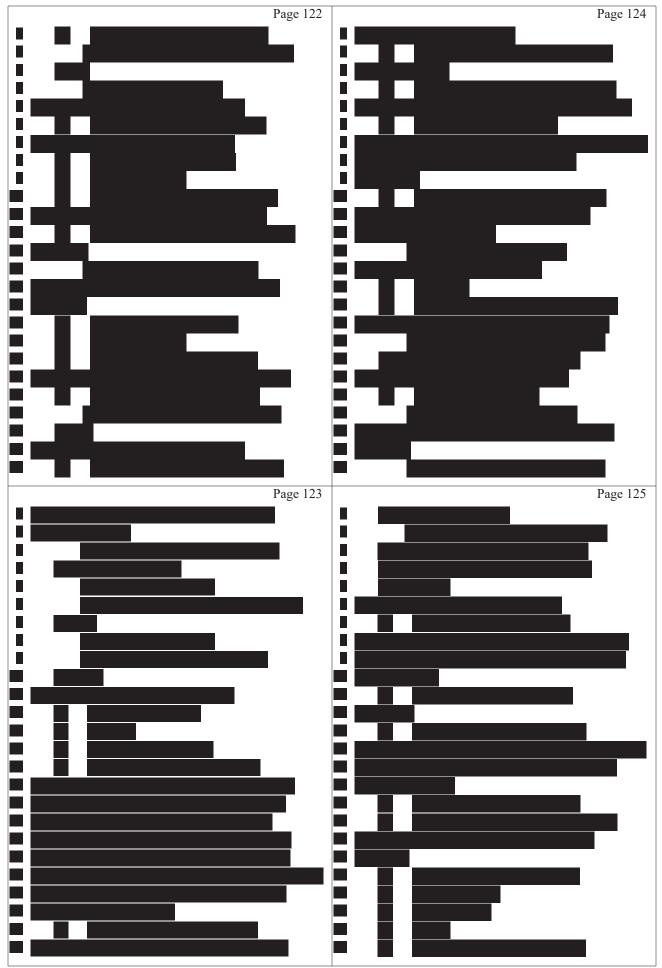




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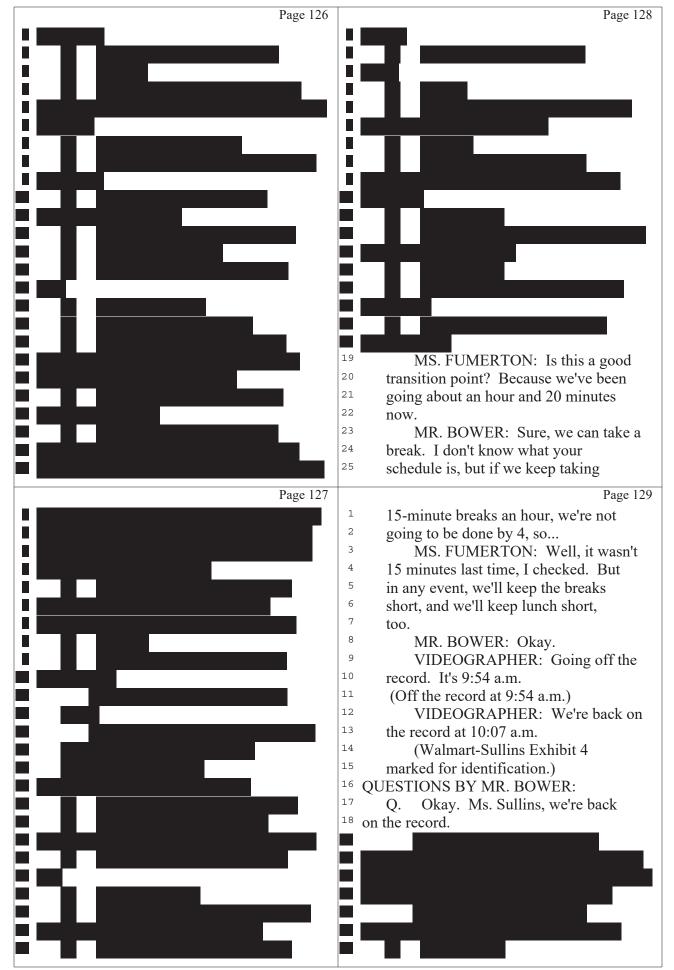
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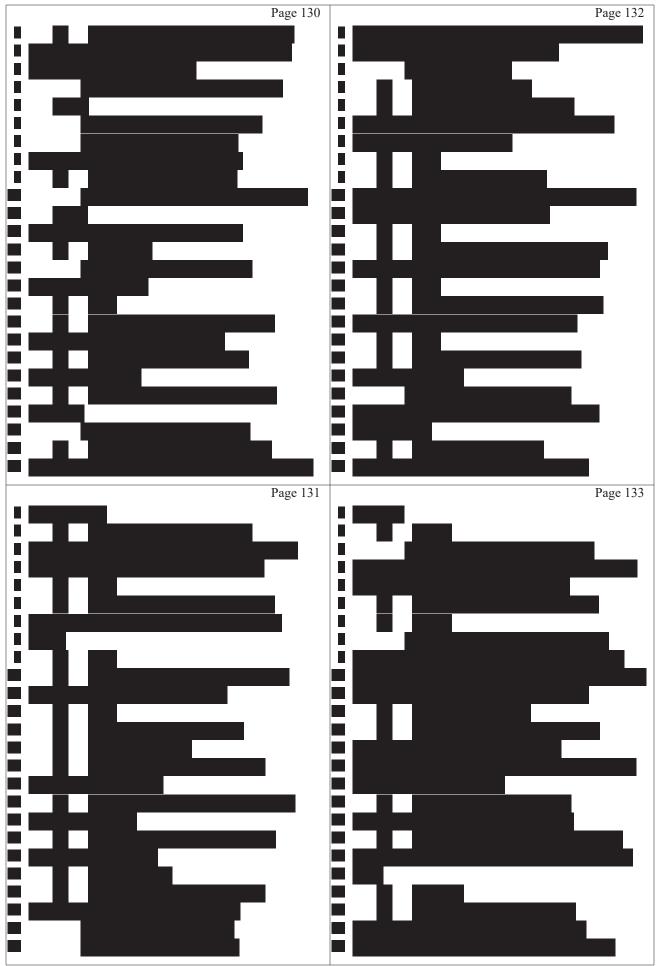




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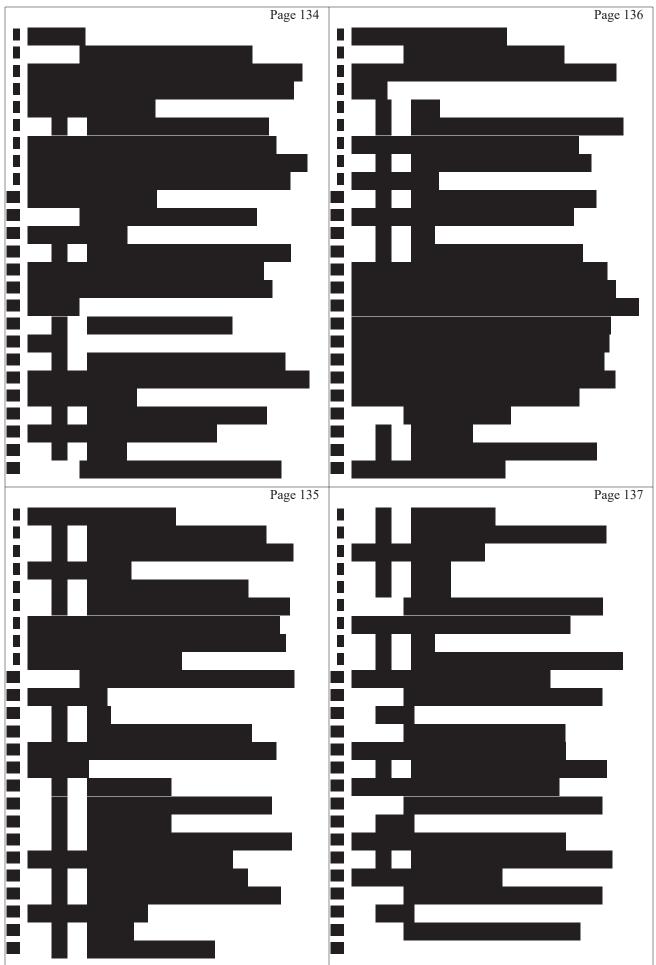
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Page 35 (134 - 137)



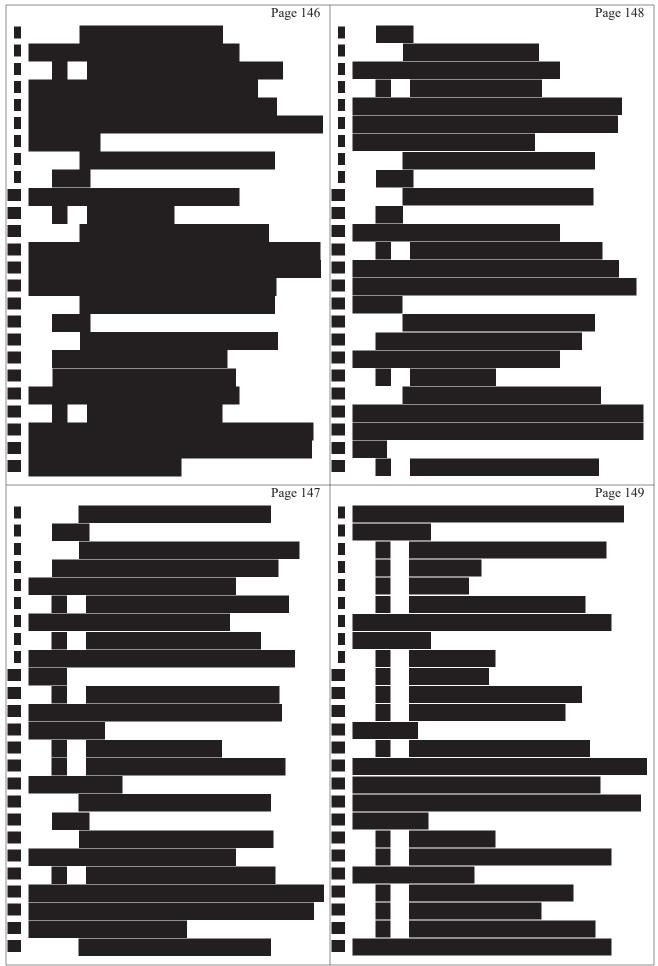
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Page 37 (142 - 145)

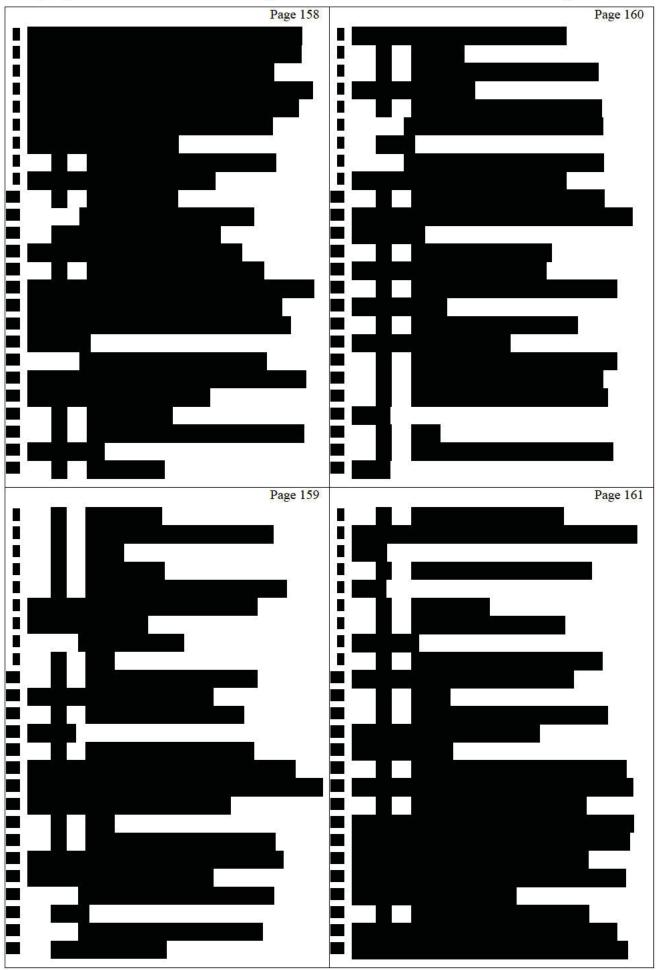






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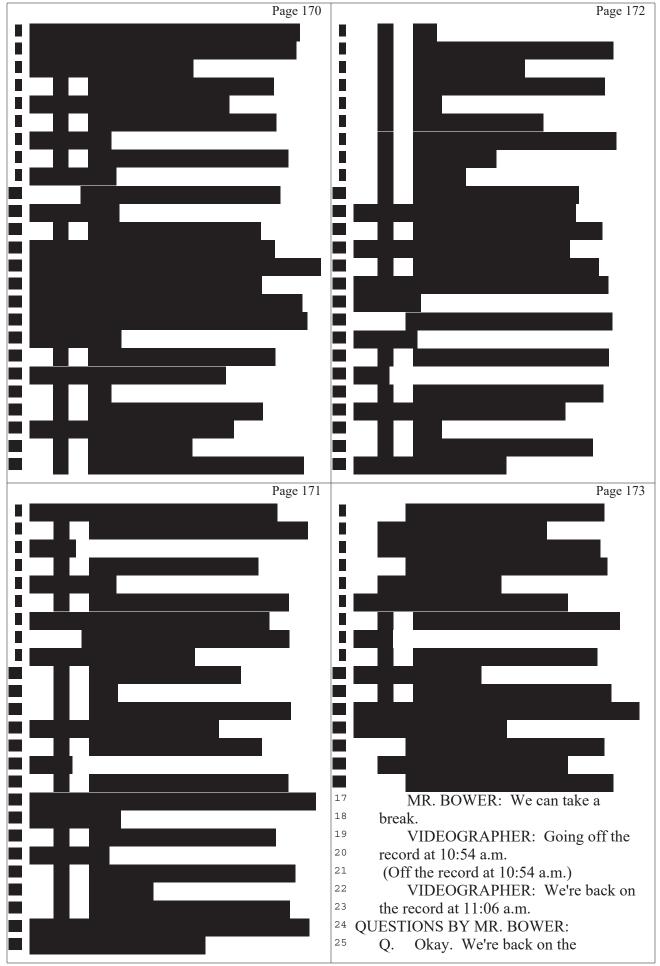
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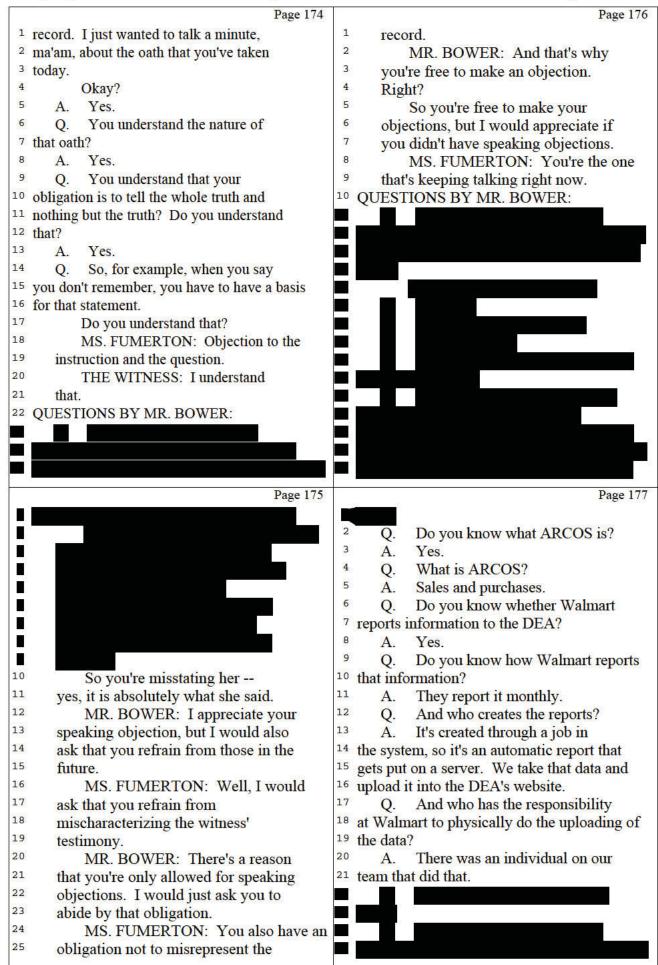
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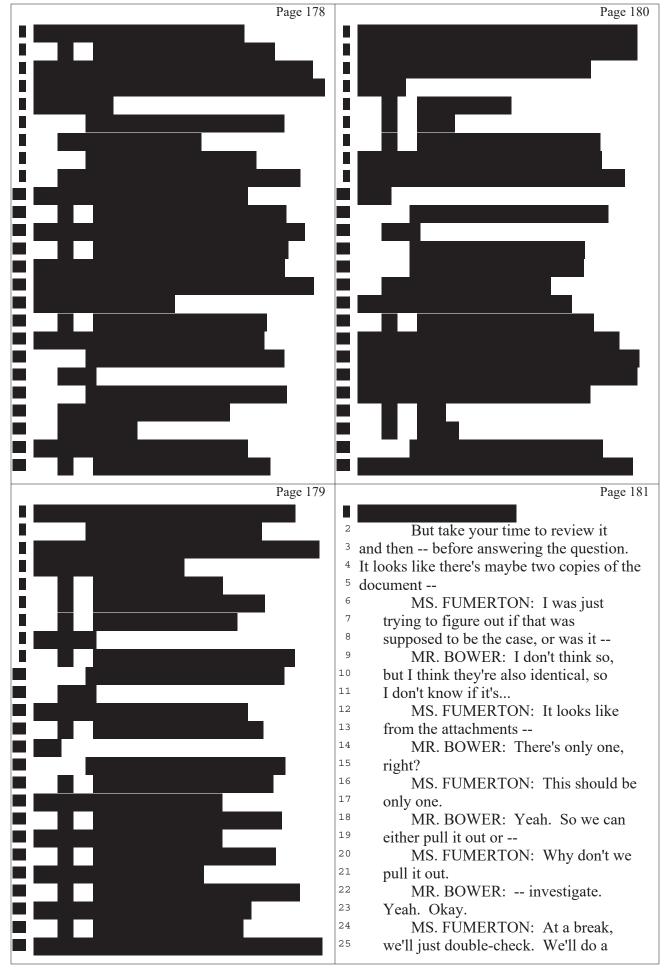


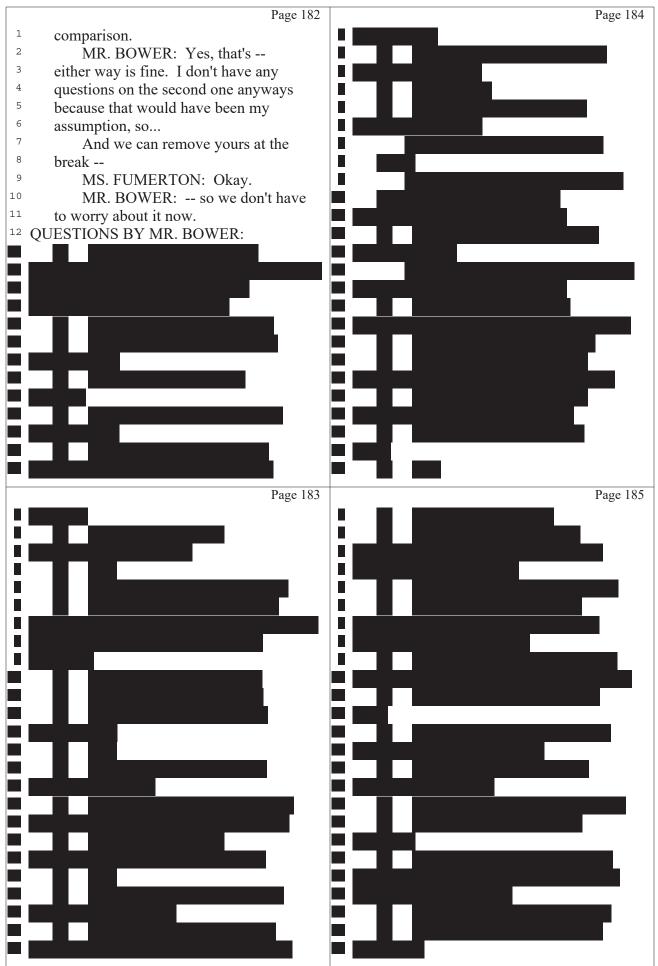
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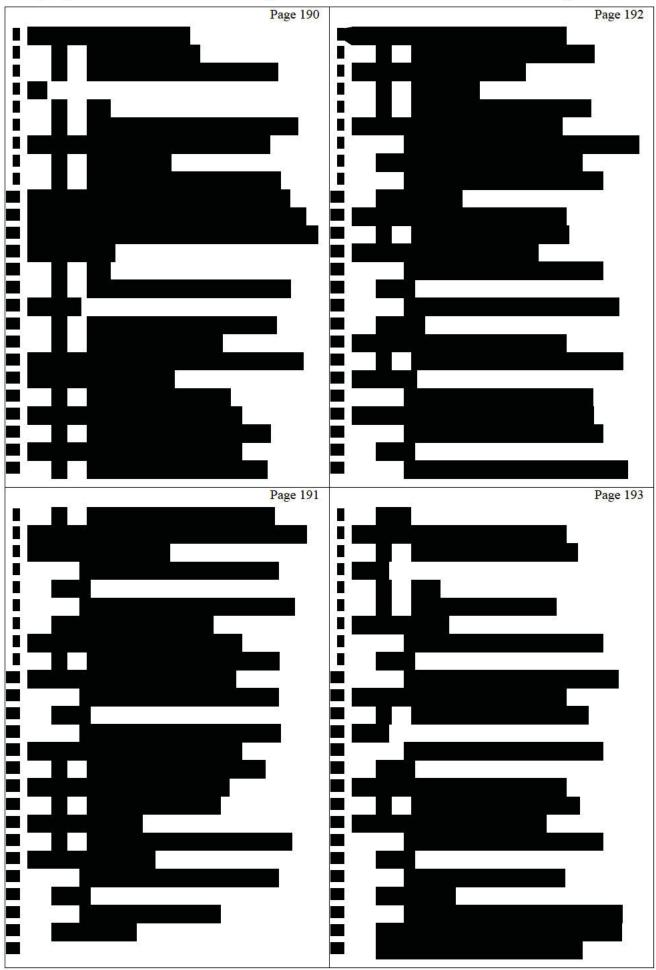






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Page 48 (186 - 189)



Page 194 Page 196 1 and insisted that she answer the 2 question. 3 So if you want her to answer 4 whether she had responsibility for 5 5 anything in the slides, you need to MS. FUMERTON: Objection. 6 6 allow her time to review the slides. Form. 7 7 MR. BOWER: I would ask, again, MR. BOWER: Are you objecting 8 8 that the slides on this e-mail were for no speaking objections. 9 9 MS. FUMERTON: And I am going sent to the people on the e-mail? 10 10 MS. FUMERTON: I'm objecting to again ask you to stop 11 because you continuously do not listen 11 misrepresenting her testimony and the 12 12 to her answers and misrepresent the record. 13 13 testimony, because she said that there Are you objecting to letting 14 14 were other people involved in the her have time to review the slides? 15 15 team, and then you keep trying to MR. BOWER: I never did. 16 16 reduce it to a smaller number. MS. FUMERTON: Yes, you did. 17 17 MR. BOWER: I don't reduce it. MR. BOWER: I just asked the 18 18 **QUESTIONS BY MR. BOWER:** auestion. 19 MS. FUMERTON: You withdrew the 20 question. 21 MR. BOWER: I withdrew the 22 question. 23 MS. FUMERTON: And now you 24 asked again. 25 MR. BOWER: Now -- let me clear Page 195 Page 197 up the record, because now you've made 2 a long record that's inaccurate, which 3 is frequent in this case. 4 I withdrew the question. I 5 asked some foundational questions and 6 then asked the question again, at which point you interjected your long 8 speaking objection which is inappropriate. 10 QUESTIONS BY MR. BOWER: 11

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MS. FUMERTON: Objection. Form. And I object to what you're asking because you're going back to the original question that you asked.

And she said, "Let me look to see if I had any responsibility," and you said you were going to withdraw that question, and then you came back

So I'll ask again. And I've given you plenty of time today to review every document. All I'm asking you is, did you have any responsibility in connection with anything represented in these slides?

MS. FUMERTON: And you can take the time to review the slides.

MR. BOWER: And while she's reviewing, I would appreciate if we could end the speaking objections because it's getting out of hand.

MS. FUMERTON: It's not getting out -- and, Zach, again, you cannot withdraw when she says, "Give me a minute to review," and you say, "I'll

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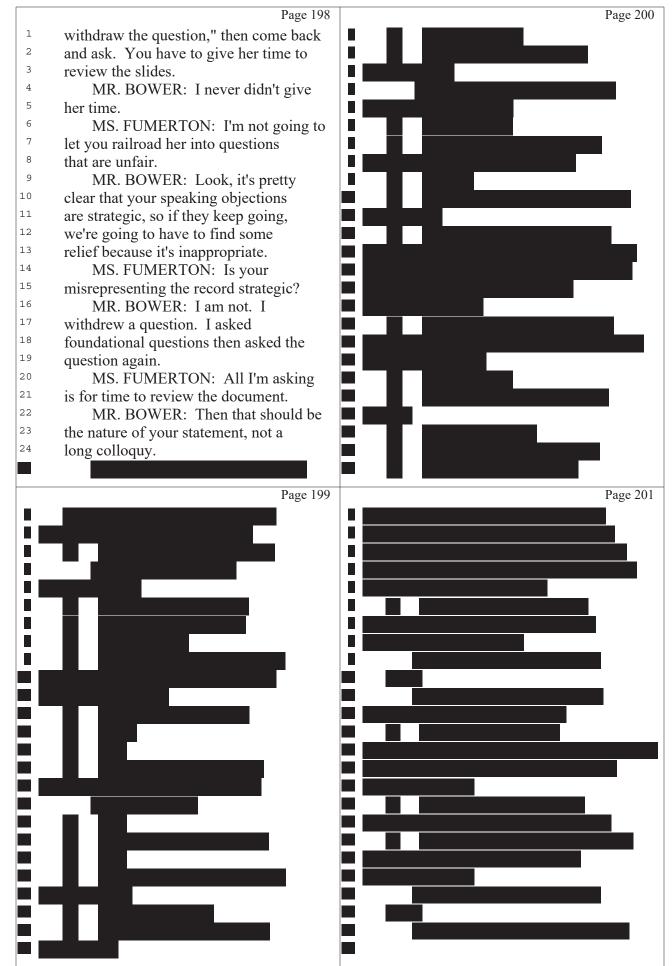
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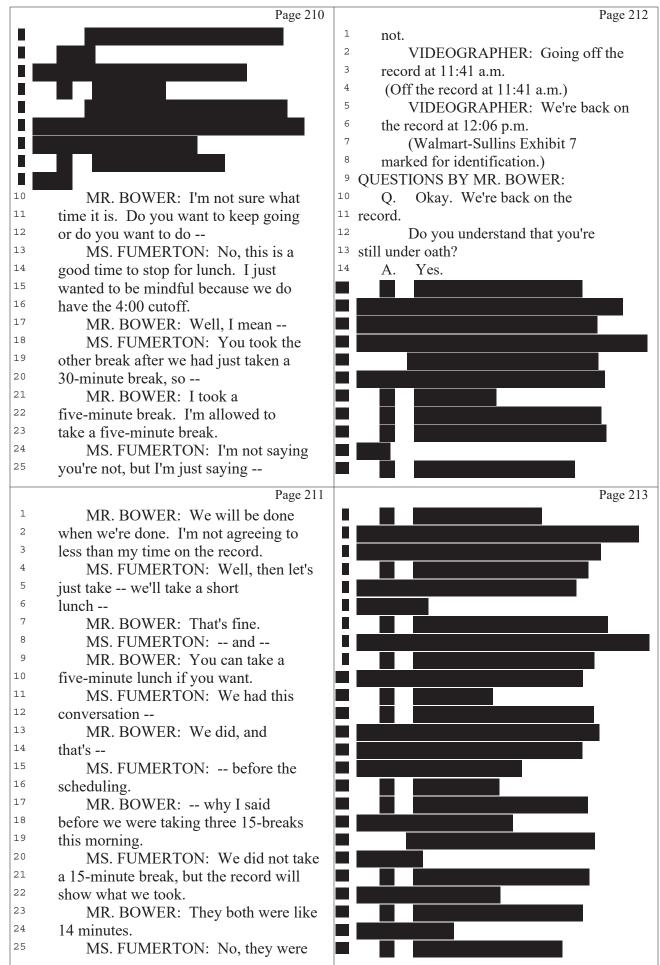
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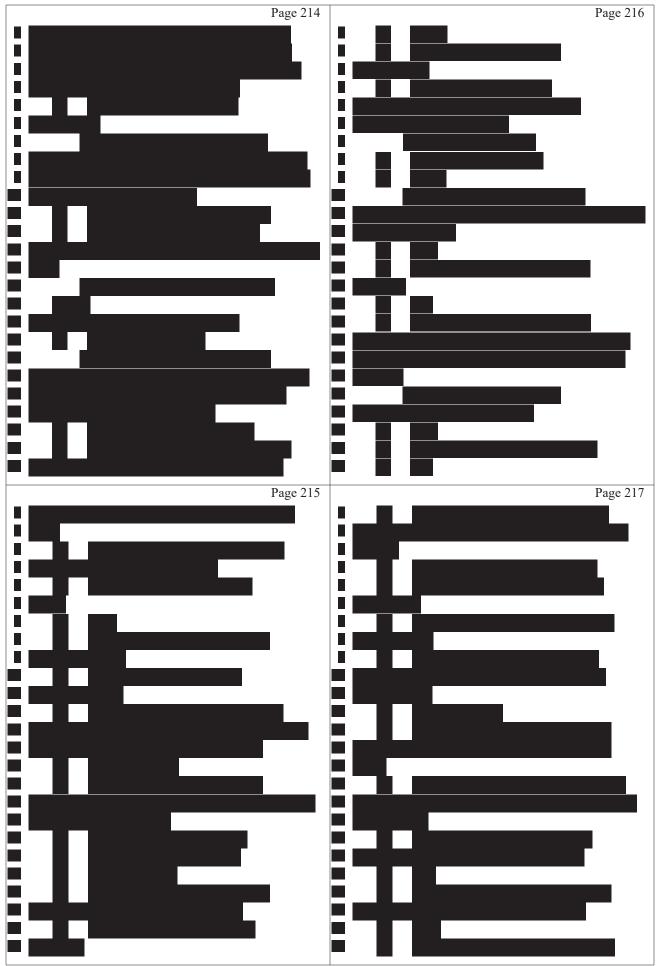
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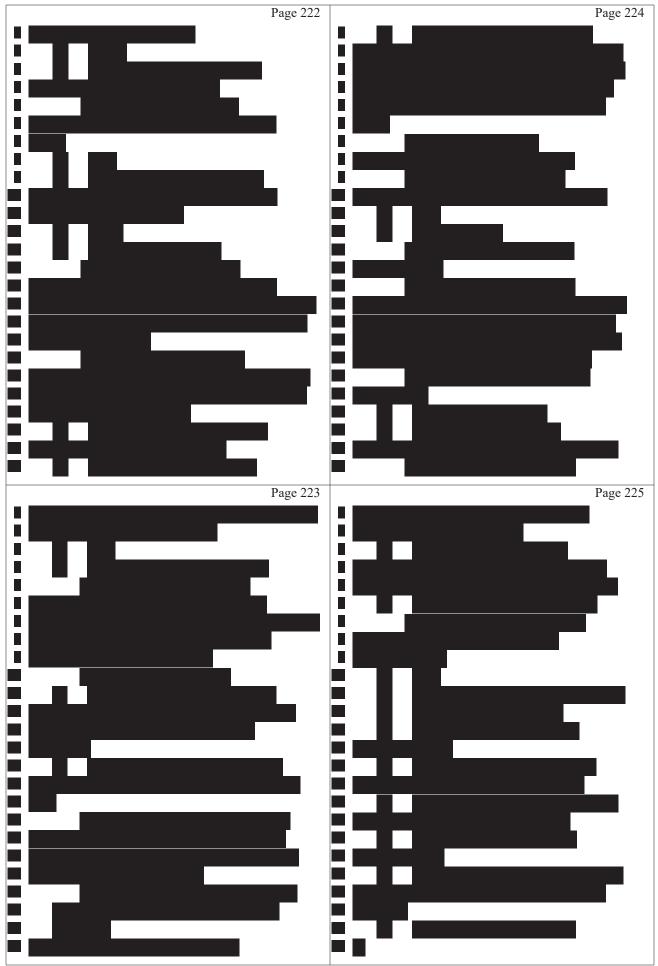


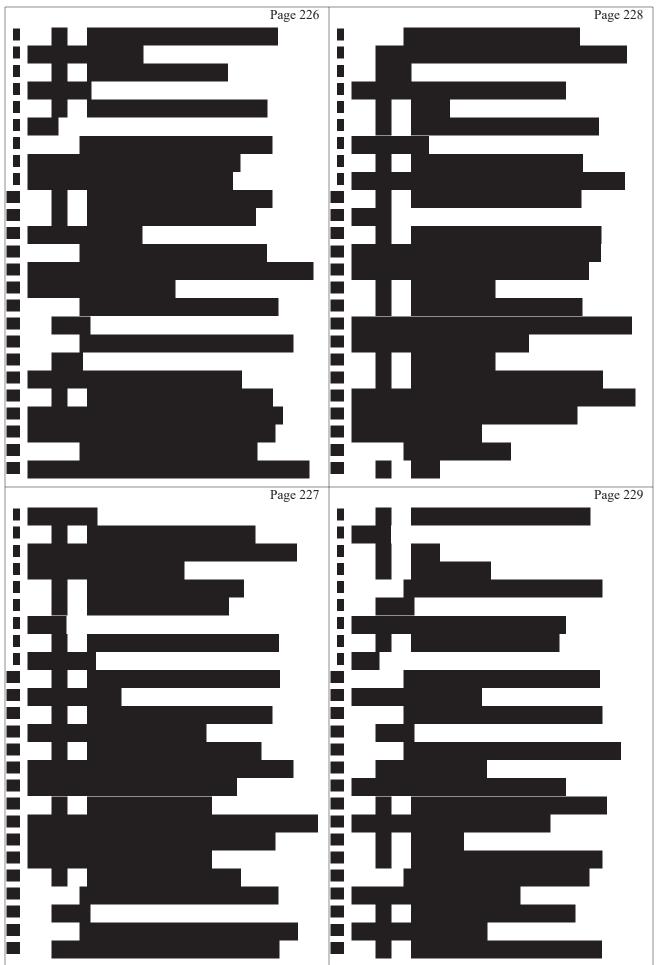






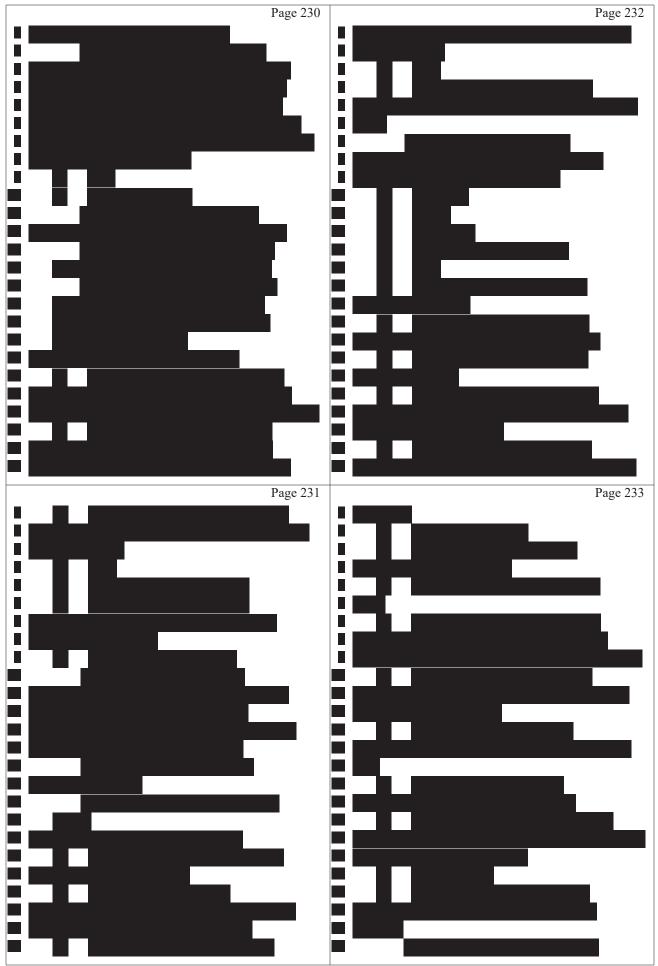






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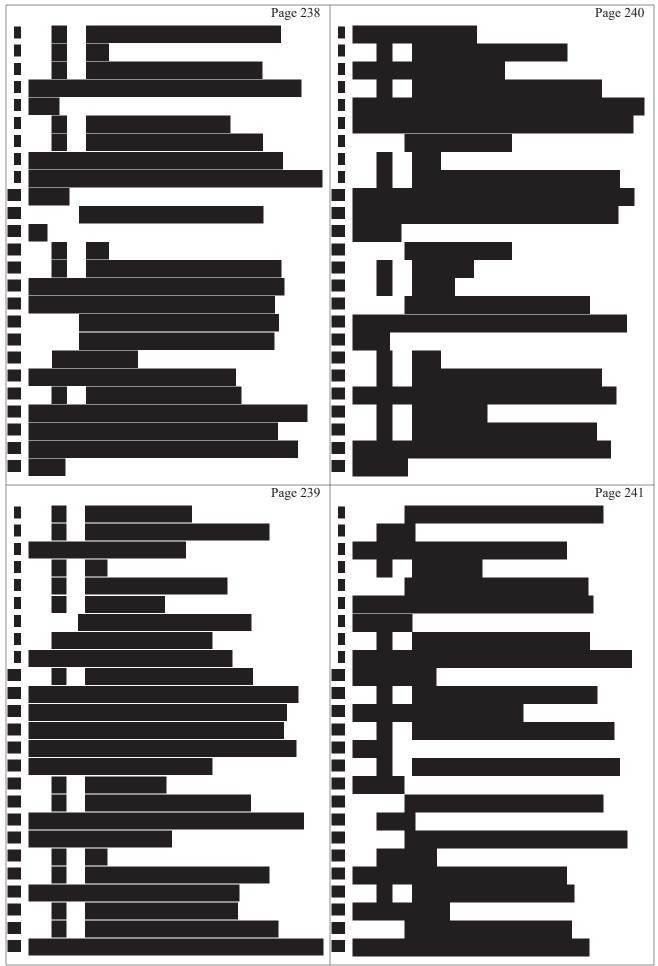
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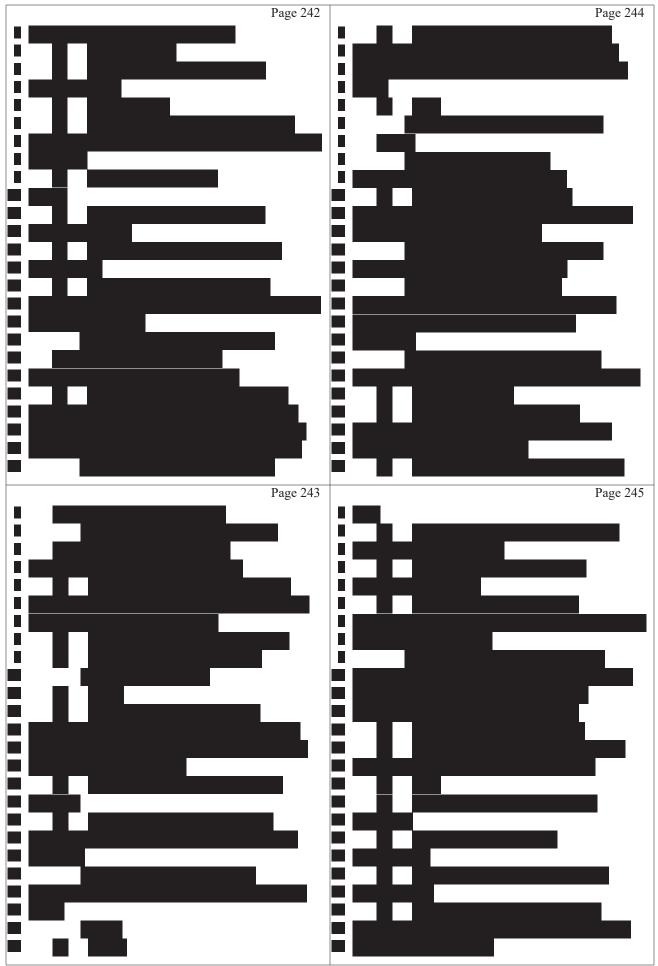
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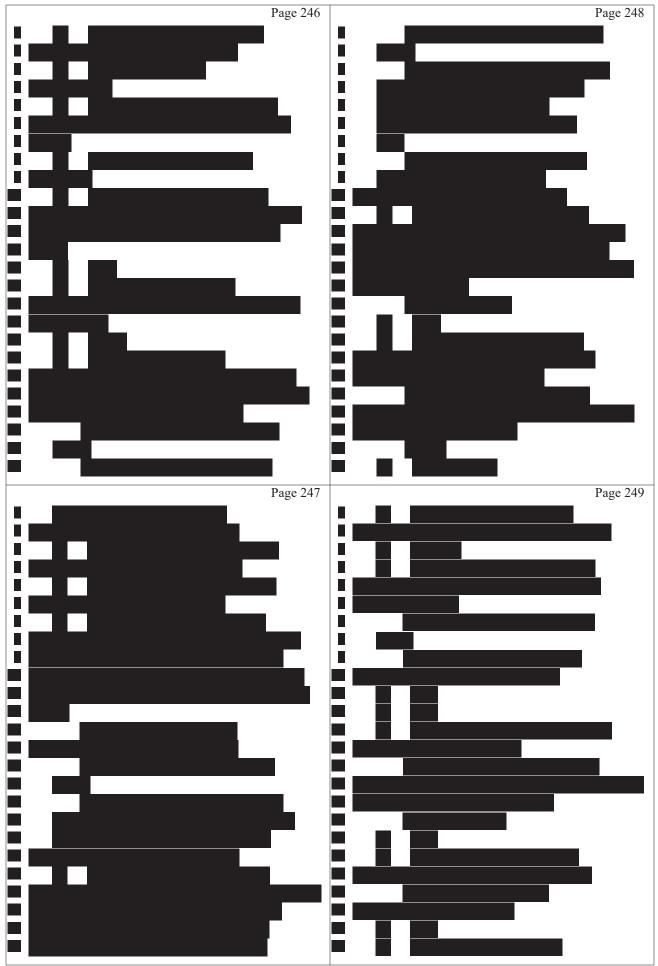
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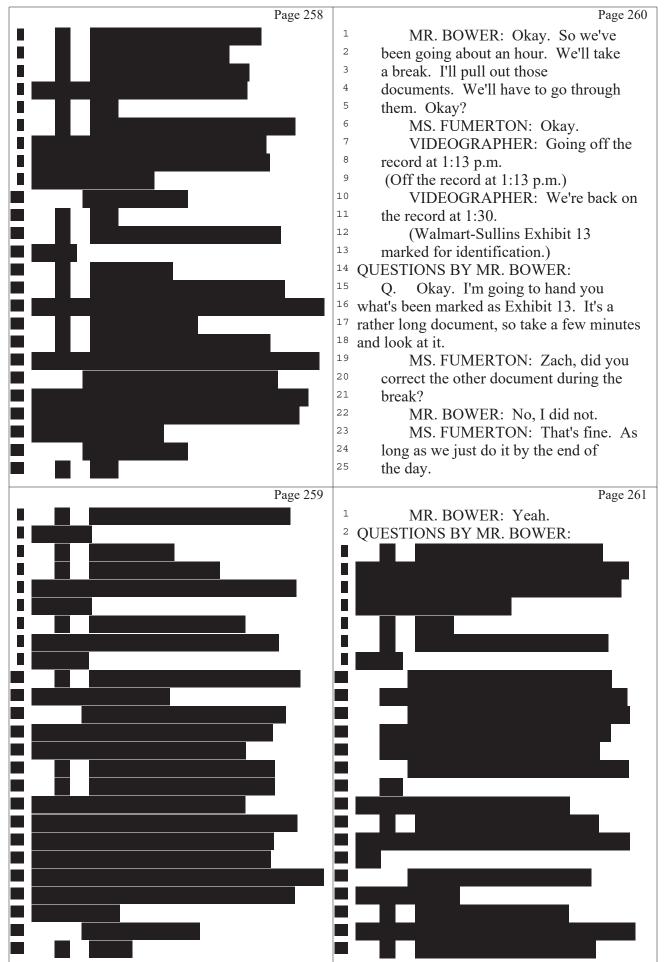
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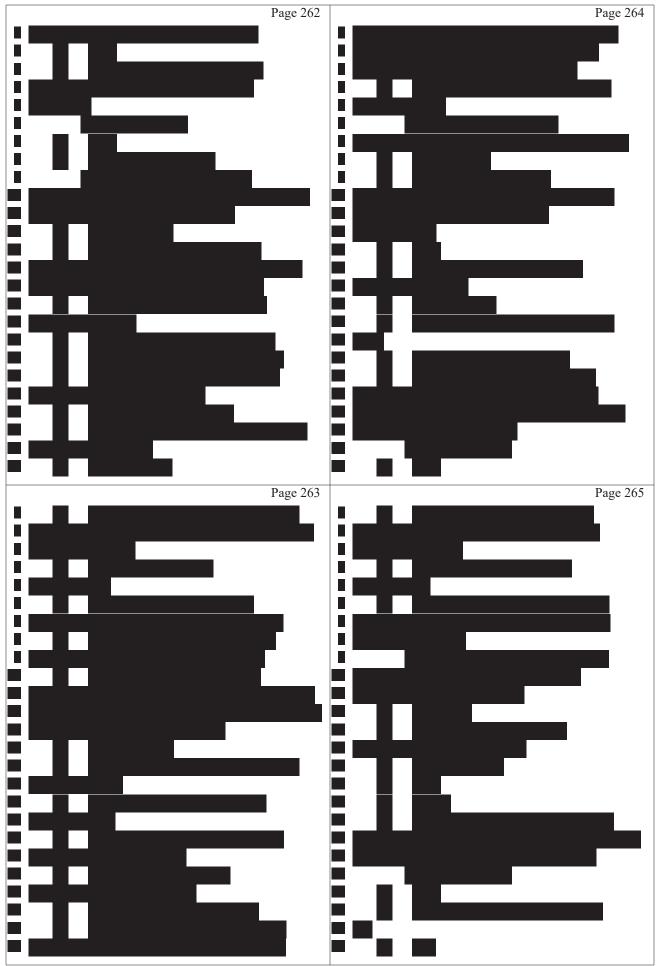




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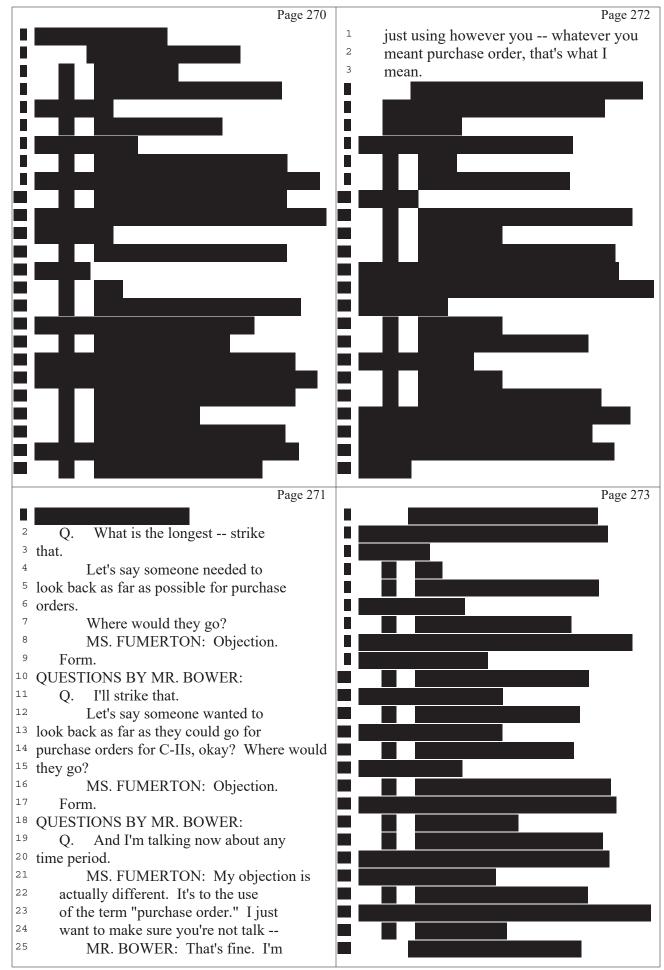


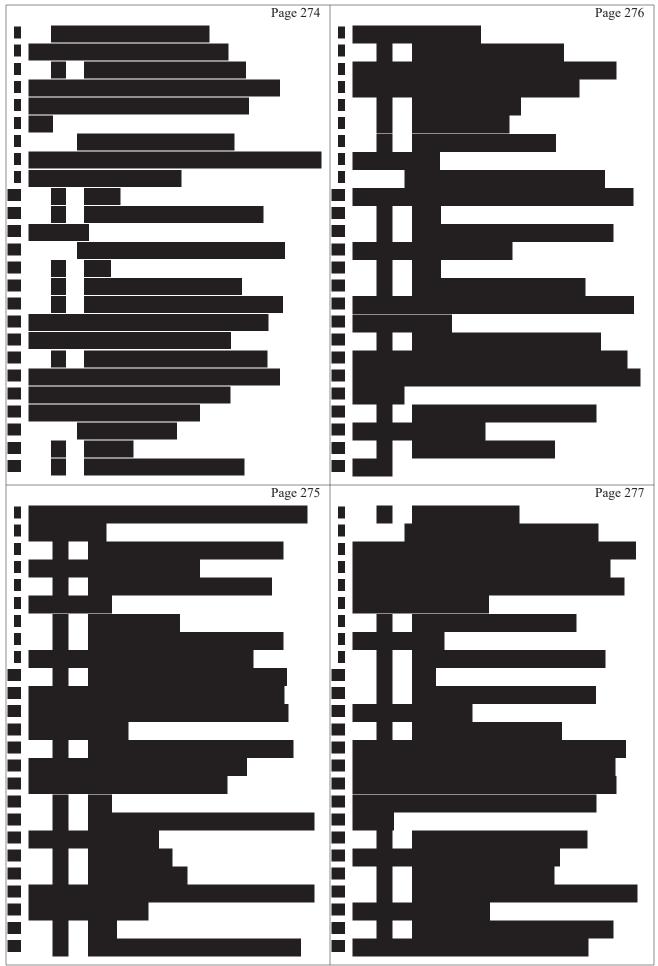


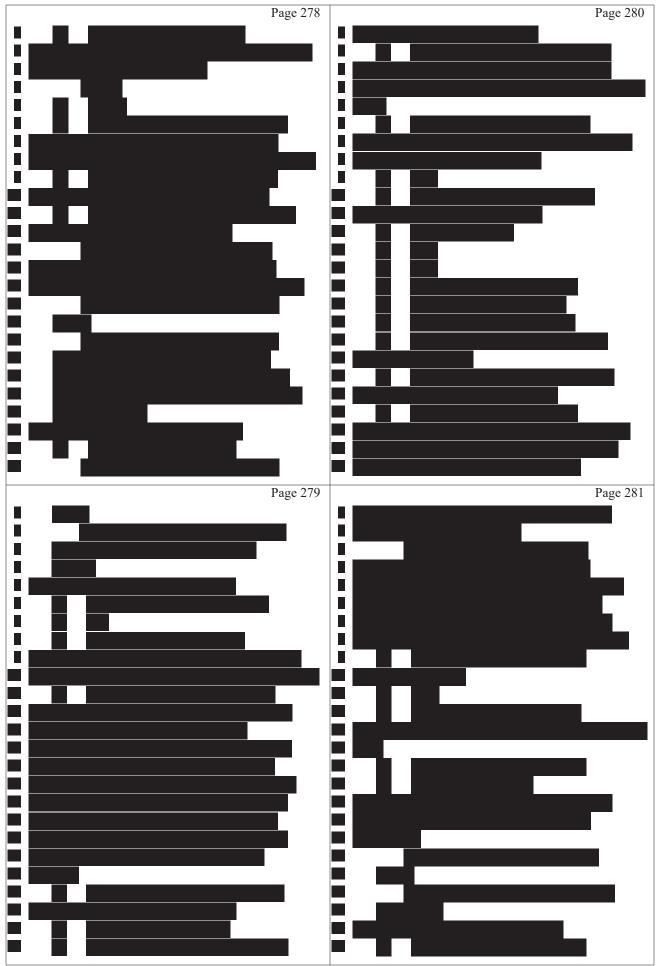
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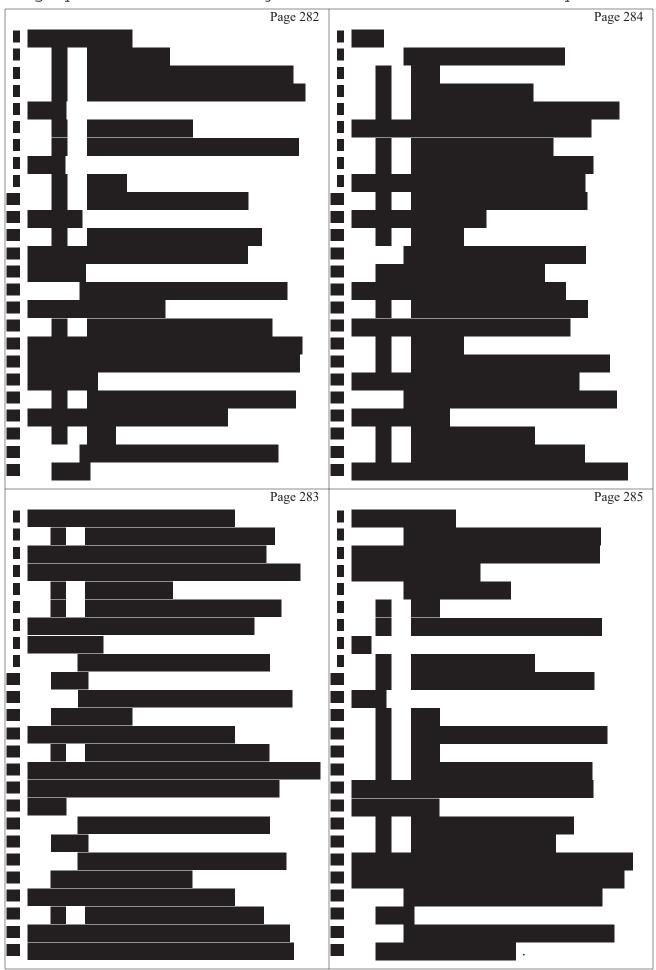


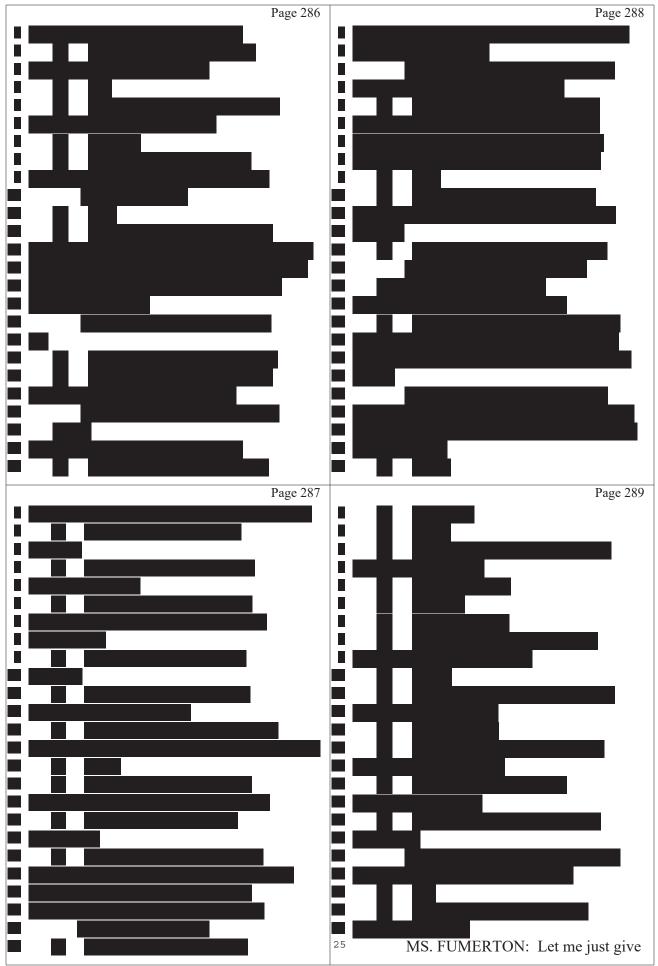




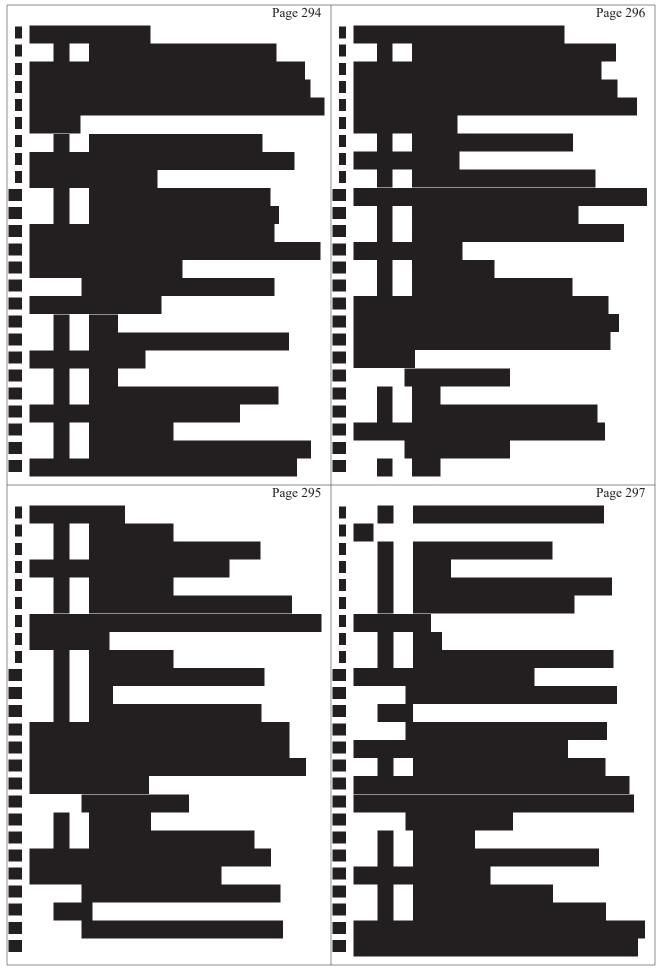
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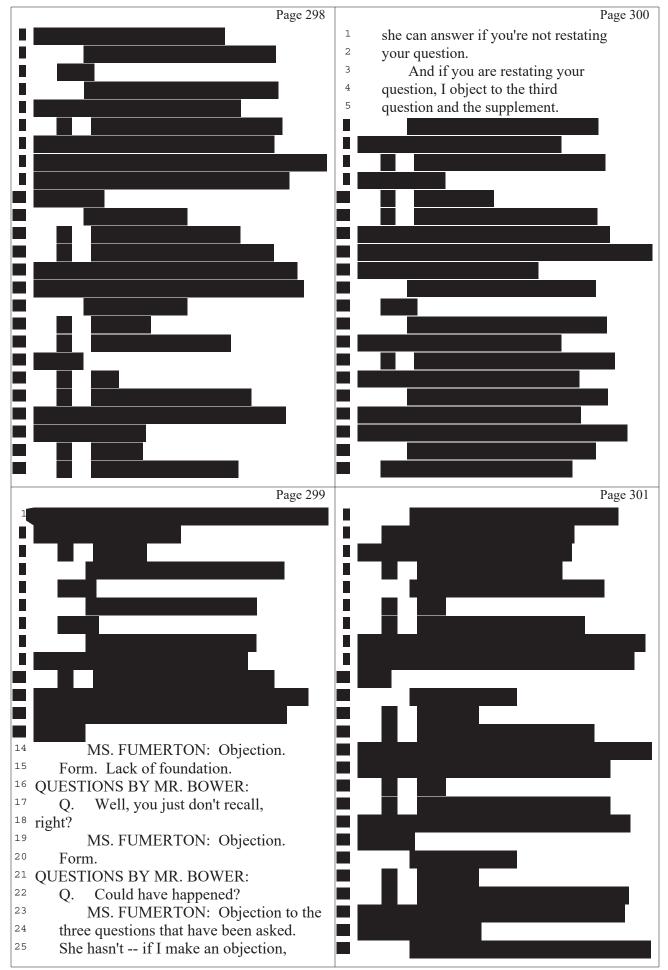






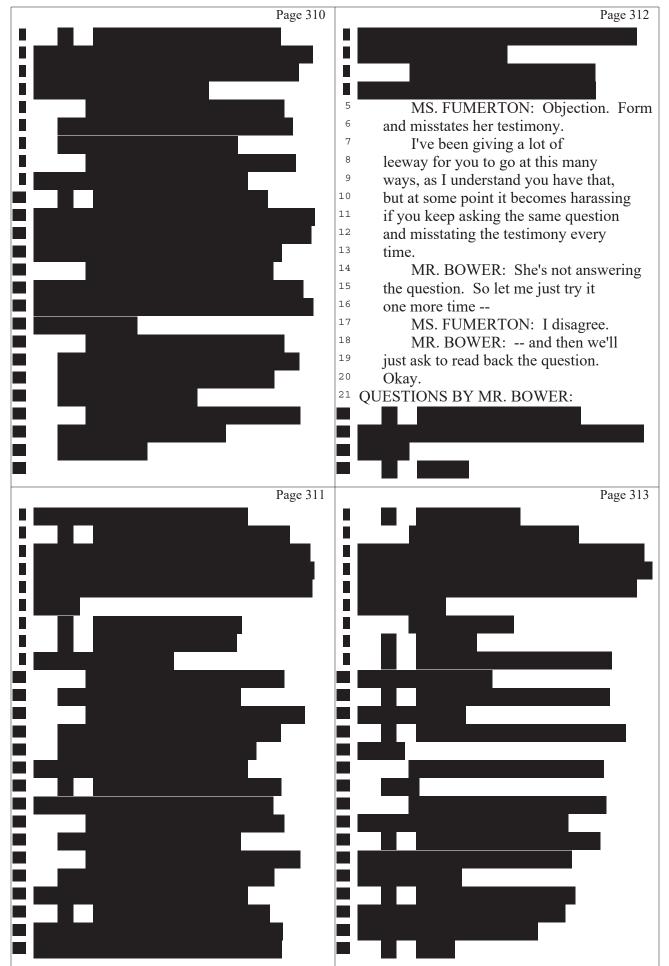
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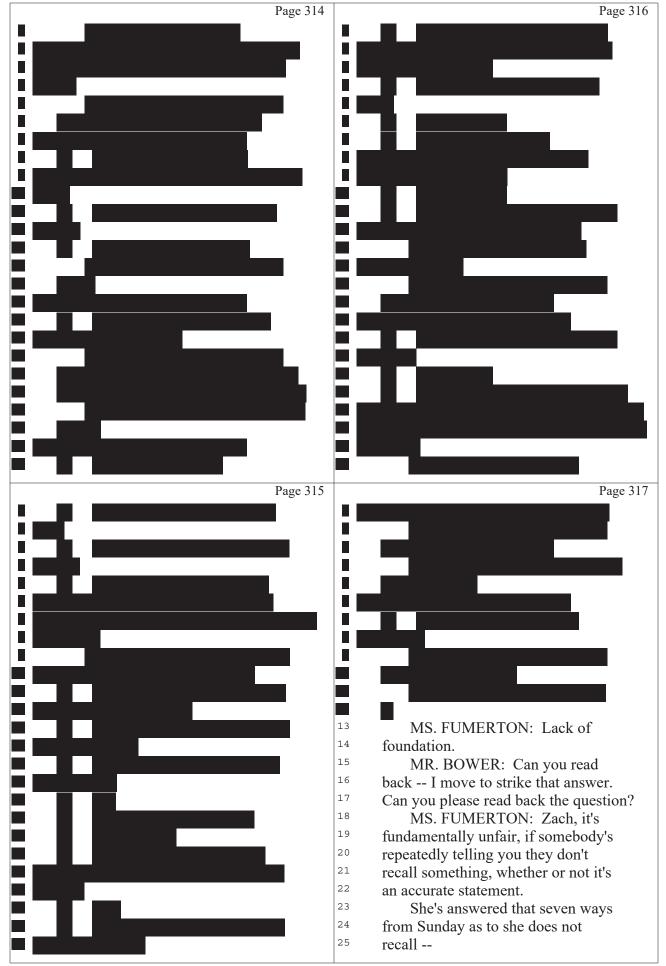
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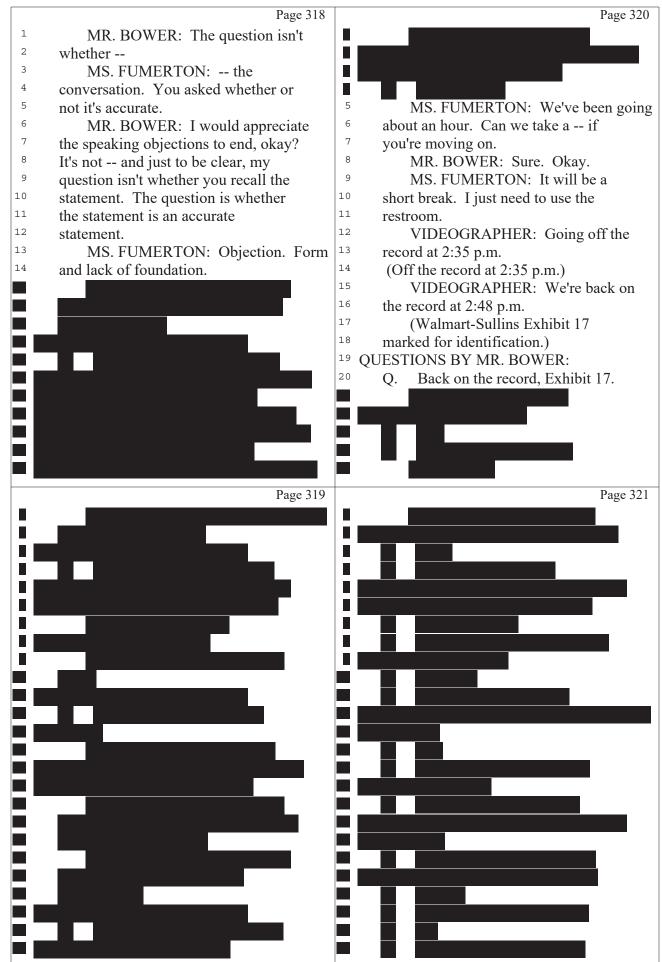










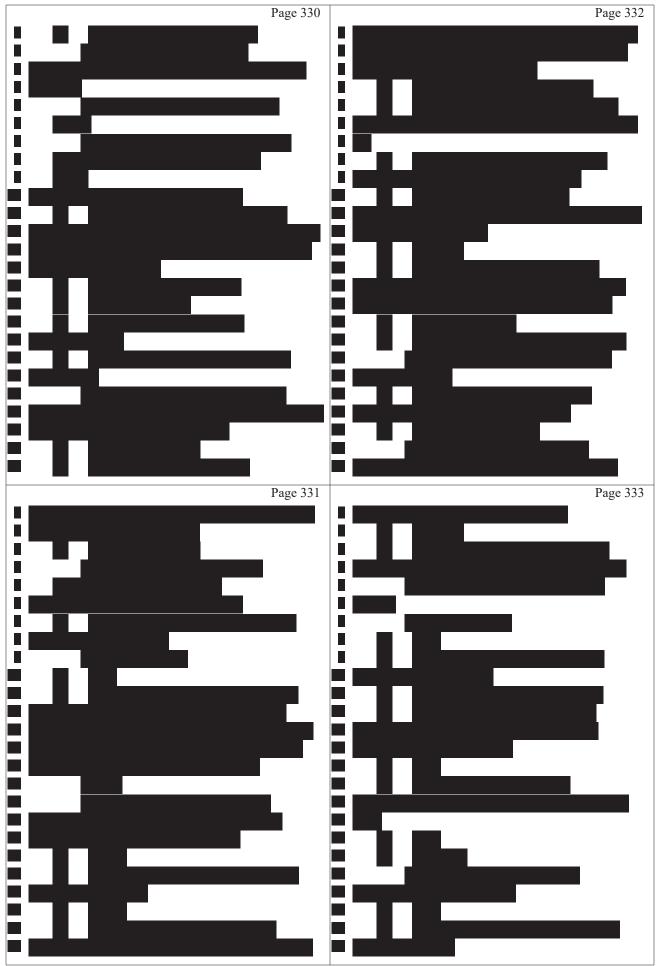




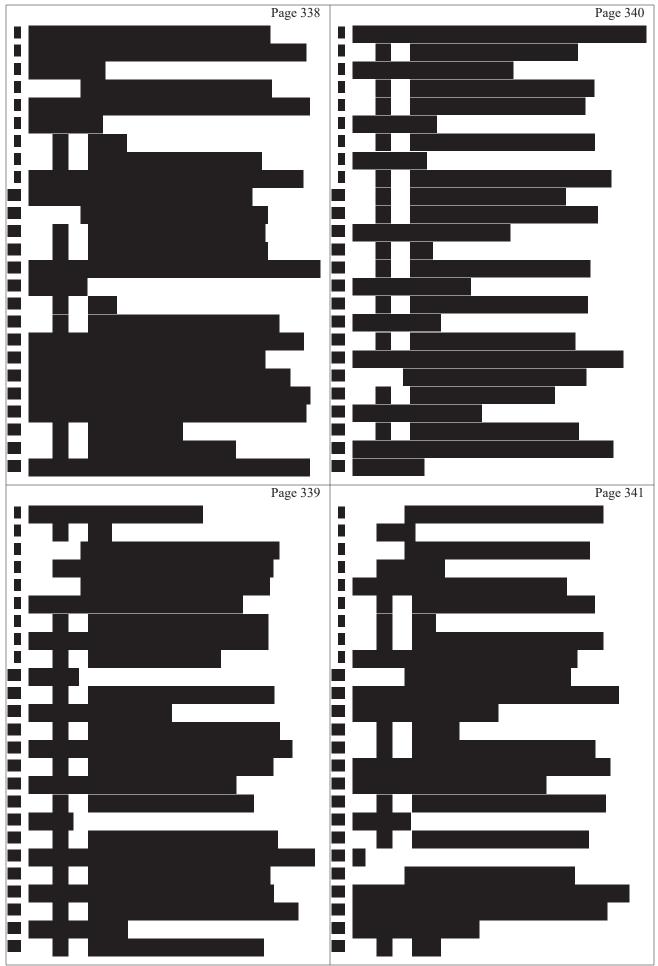
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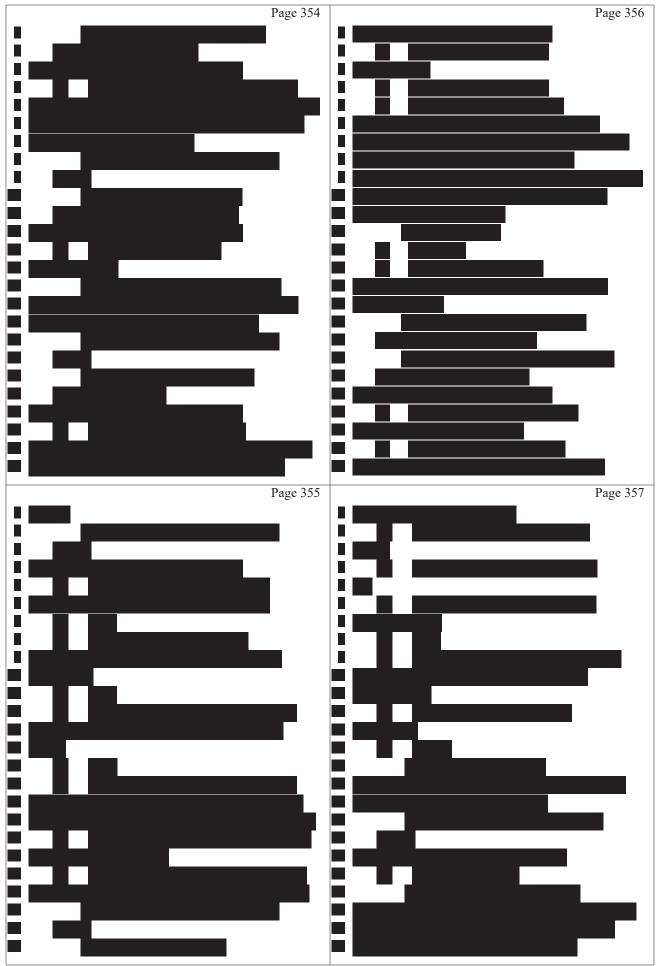


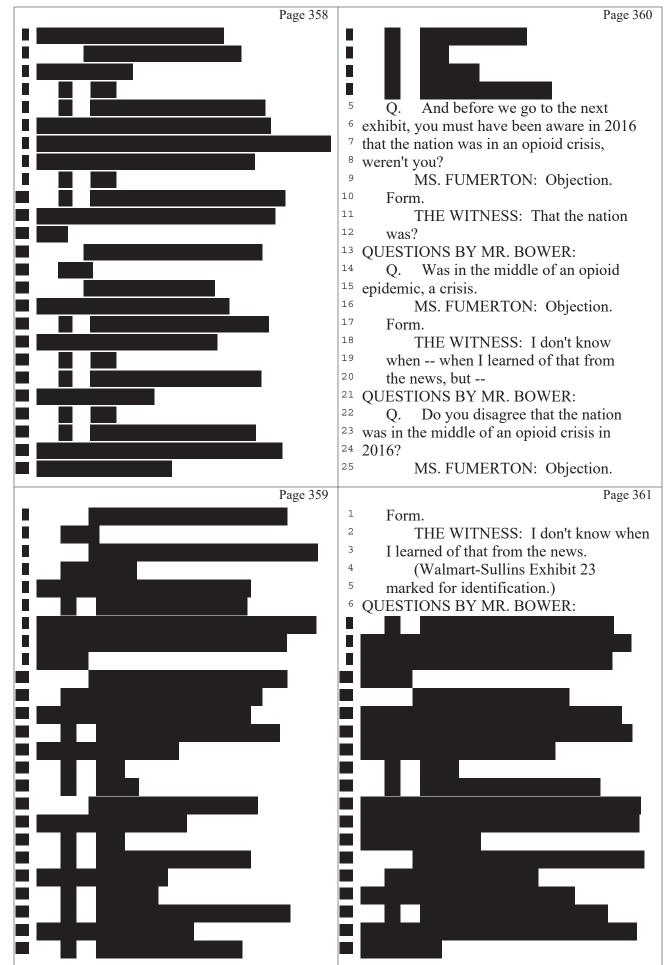


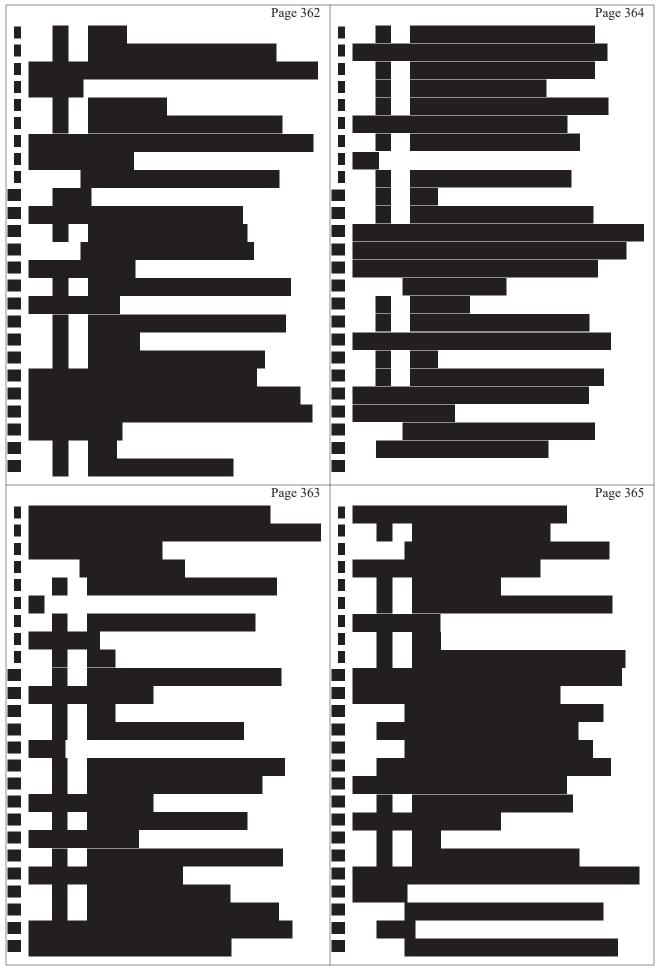


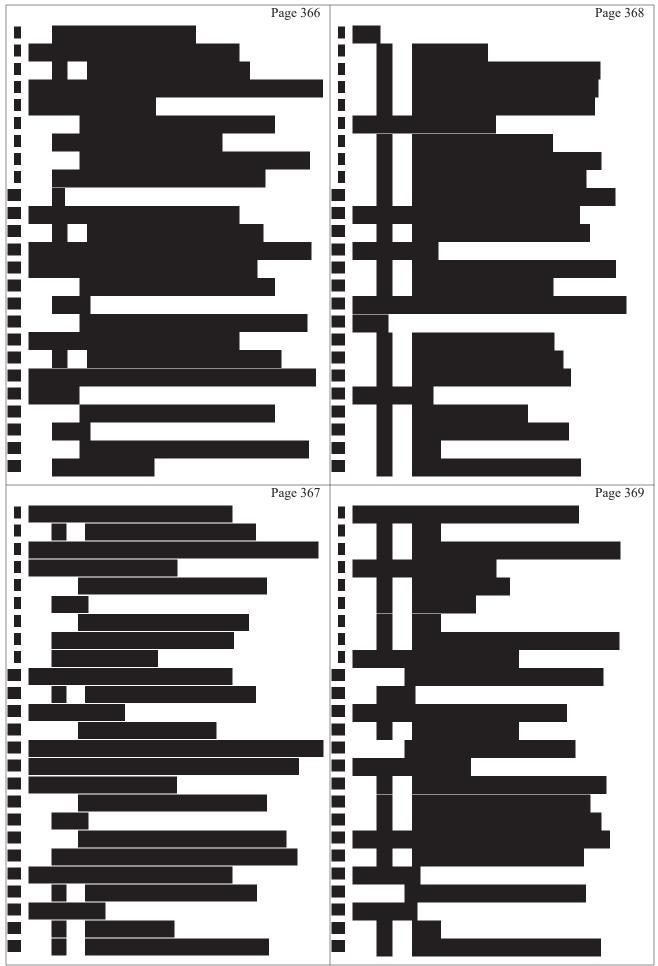


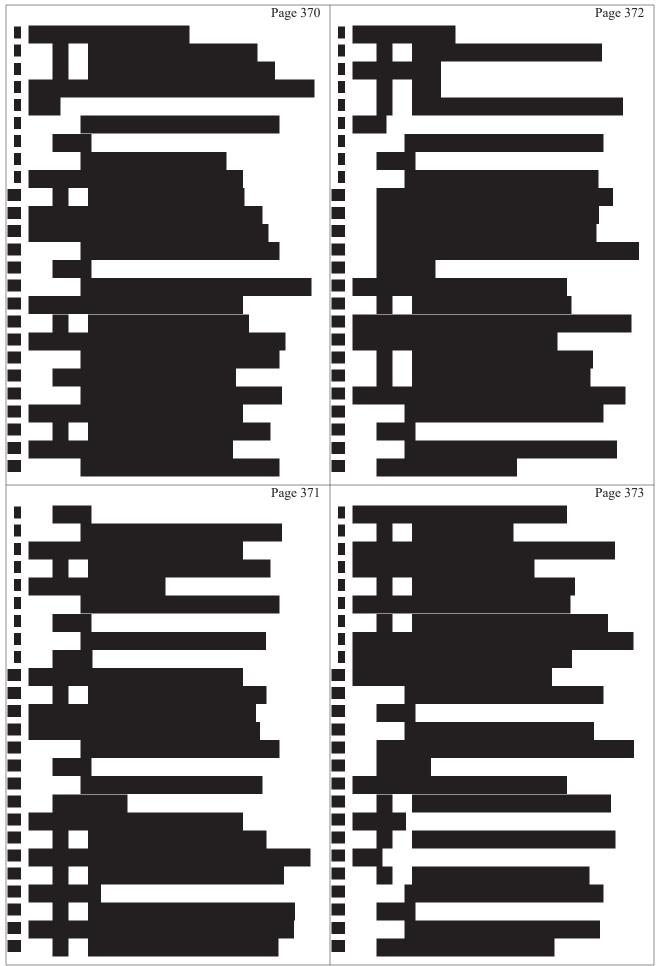


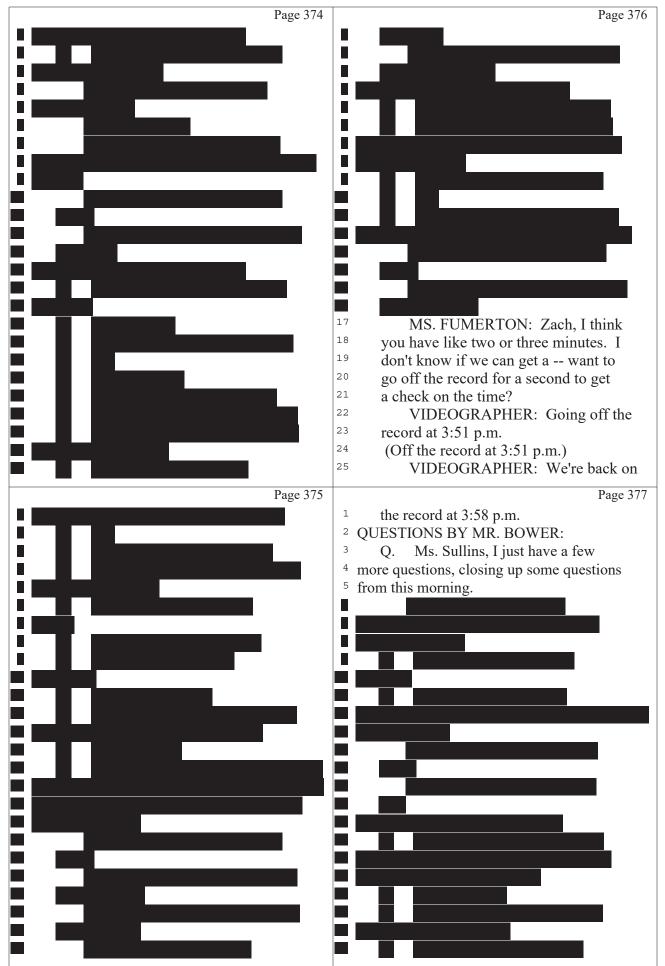


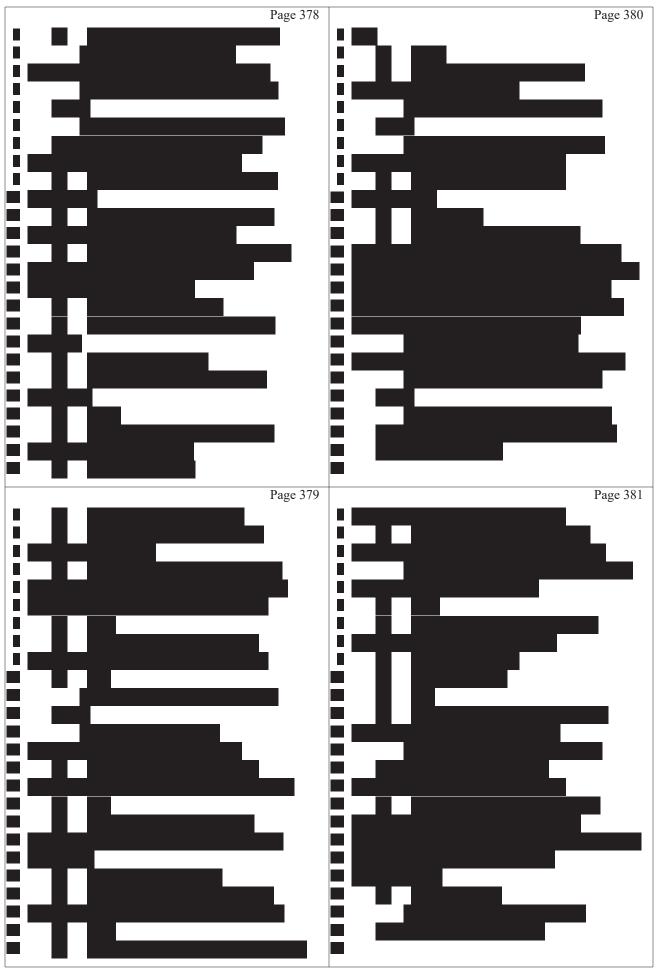








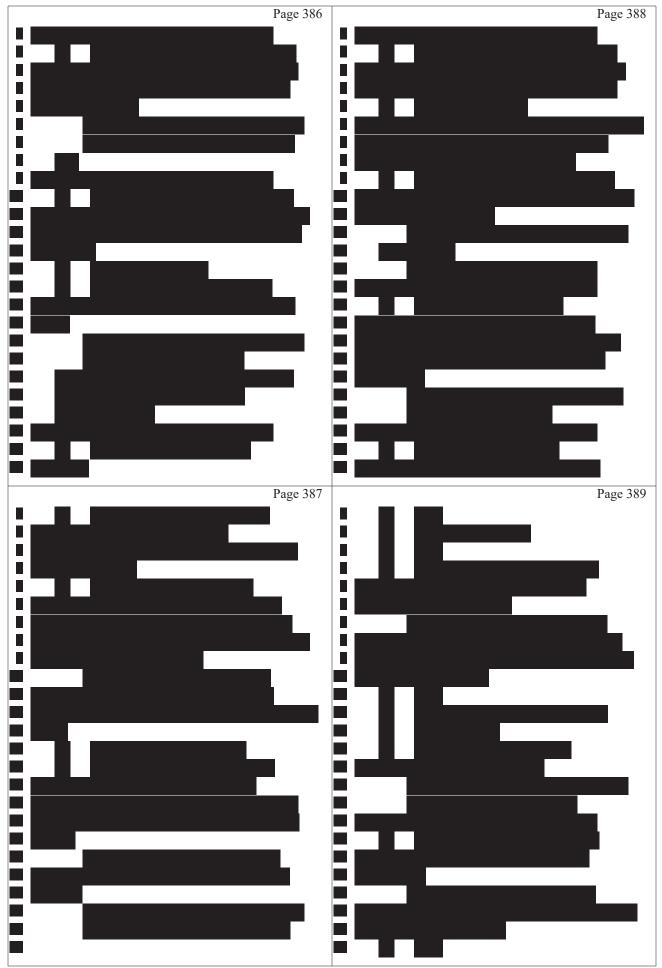


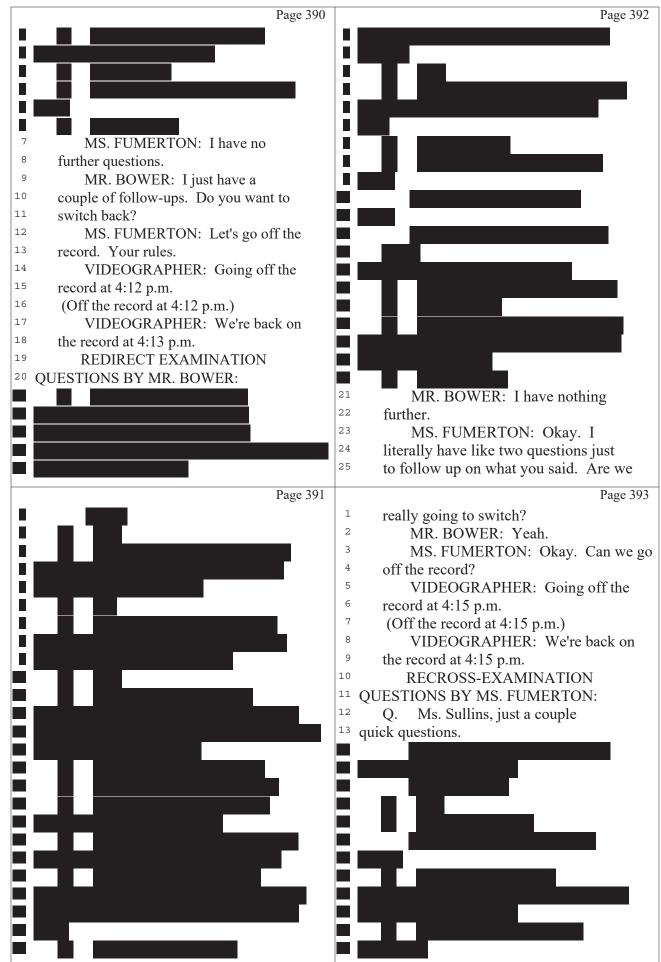


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	Page 394		Page 396
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			INSTRUCTIONS TO WITNESS
		2	
		3	Please read your deposition over
15		4	· · · · · · · · · · · · · · · · · · ·
			carefully and make any necessary corrections.
		5	You should state the reason in the
		6	appropriate space on the errata sheet for any
		7	corrections that are made.
	NG FYN (FRENC) Y 1		
8	MS. FUMERTON: I have no	8	After doing so, please sign the
9	further questions.	9	errata sheet and date it. You are signing
10	MR. BOWER: I have nothing	10	same subject to the changes you have noted on
11	further.	11	the errata sheet, which will be attached to
12	VIDEOGRAPHER: Going off the	12	your deposition.
13	record at 4:16 p.m.	13	It is imperative that you return
14		111	
	This concludes the videotaped	14	the original errata sheet to the deposing
15	deposition of Ramona Sullins.	15	attorney within thirty (30) days of receipt
16	(Deposition concluded at 4:16 p.m.)	16	of the deposition transcript by you. If you
17	(2 eposition concluded at 1.10 p.m.)	17	
			fail to do so, the deposition transcript may
18		18	be deemed to be accurate and may be used in
19		19	court.
20		20	
21		21	
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	D 205		D 207
	Page 395		Page 397
1	Page 395 CERTIFICATE	1	Page 397 ACKNOWLEDGMENT OF DEPONENT
2	CERTIFICATE	1 2	
	CERTIFICATE		
2	CERTIFICATE	2	
2 3 4	CERTIFICATE	2 3	ACKNOWLEDGMENT OF DEPONENT  I, , do
2 3 4 5	CERTIFICATE  I, CARRIE A. CAMPBELL, Registered Diplomate Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination. Ramona Sullins was duly	2 3	ACKNOWLEDGMENT OF DEPONENT  I,
2 3 4 5	CERTIFICATE  I, CARRIE A. CAMPBELL, Registered Diplomate Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination. Ramona Sullins was duly	2 3 4	ACKNOWLEDGMENT OF DEPONENT  I,, do hereby certify that I have read the foregoing pages and that the same is a correct
2 3 4 5	CERTIFICATE  I, CARRIE A. CAMPBELL, Registered Diplomate Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination, Ramona Sullins was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.  I DO FURTHER CERTIFY that the	2 3 4	ACKNOWLEDGMENT OF DEPONENT  I,
2 3 4 5 6 7	CERTIFICATE  I, CARRIE A. CAMPBELL, Registered Diplomate Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination, Ramona Sullins was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.  I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the	2 3 4	ACKNOWLEDGMENT OF DEPONENT  I,
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2 3 4 5 6 7	I, CARRIE A. CAMPBELL, Registered Diplomate Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination, Ramona Sullins was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.  I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.	2 3 4 5 6 7	I,
2 3 4 5 6 7 8 9	I, CARRIE A. CAMPBELL, Registered Diplomate Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination, Ramona Sullins was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.  I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.	2 3 4 5 6 7 8 9	I,
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